

APPENDIX A

Notice of Preparation,

Scoping Summary, Initial Study

**NOTICE OF PREPARATION/NOTICE OF PUBLIC SCOPING MEETING
FOR A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
6TH CYCLE 2021-2029 HOUSING ELEMENT**

DATE: October 30, 2020

TO: State Clearinghouse, Responsible Agencies, Trustee Agencies, Organizations and Interested Parties

LEAD AGENCY: City of Santa Monica
City Planning Division
1685 Main Street, Mail Stop 28
Santa Monica, California 90401
Contact: Rachel Kwok, Environmental Planner
Email: Rachel.Kwok@smgov.net

The City of Santa Monica (City) intends to prepare an Environmental Impact Report (EIR) for the proposed 6th Cycle 2021-2029 Housing Element of the City's General Plan. In accordance with Section 15082 of the State CEQA Guidelines, the City has prepared this Notice of Preparation (NOP) to provide the public, Responsible Agencies, and other interested parties with information describing the proposed project and its potential environmental effects. The EIR will address the proposed project's potentially significant effects in the following environmental issue areas:

- Air Quality
- Cultural Resources
- Energy
- Greenhouse Gas Emissions
- Land Use and Planning
- Noise
- Population/Housing
- Public Services
- Transportation/Circulation
- Tribal Cultural Services
- Utilities
- Mandatory Findings of Significance

PROJECT APPLICANT: City of Santa Monica

PROJECT LOCATION: The City of Santa Monica is located in Los Angeles County along the coast of the Pacific Ocean. The City is surrounded on three sides by the City of Los Angeles, including the westside communities of Brentwood, Mar Vista, Pacific Palisades, Venice and West Los Angeles. The City comprises approximately 5,280 acres (approximately 8.25 square miles). See Figure 1

PROJECT DESCRIPTION: Since 1969, California has required that all local governments (cities and counties) adequately plan to meet the housing needs of everyone in the community. One of the required elements of a General Plan is the Housing Element. California State law requires that communities prepare and update the Housing Element every eight years. The Housing Element serves as the City's guide for addressing the housing needs of all segments of Santa Monica's population. Housing needs are determined by the California Housing and Community Department (HCD), who decides what the numerical housing targets should be for each regional council of governments. Each council of government across the state then further allocates the regional housing number (known as the Regional Housing Needs Allocation – or RHNA) to every city and county within its jurisdiction. The RHNA is a targeted housing number - Cities and counties do not have to build this number of units, but rather they must plan for them and show that under current land use and development standards, there is capacity to accommodate for this number of housing.

For the proposed 6th Cycle 2021-2029 Housing Element, the Southern California Association of Governments (SCAG) has determined that the City's draft RHNA allocation is 8,874 units, more than 5 times than the last cycle. The significant increase in the City's RHNA housing number is indicative of the severity of the current housing crisis. As part of the proposed 2021-2029 Housing Element, Santa Monica must demonstrate to the State that there is available capacity within its jurisdictional boundaries to meet its targeted RHNA number. Per State requirements, the City's proposed Housing Element would include the following components:

- A detailed analysis of the City's demographic, economic and housing characteristics.
- An analysis of the barriers to producing and preserving housing.
- A review of the City's progress in implementing current housing policies and programs.
- An identification of goals, objectives, and policies, in addition to a full list of programs that will implement the vision of the plan.
- A list of sites (aka the Suitable Sites Inventory) that could accommodate new housing, demonstrating the City's ability to meet the quantified housing number established in the RHNA.

The proposed 6th Cycle Housing Element must be certified by the State Department of Housing and Community Development no later than October 2021.

REVIEW PERIOD: State CEQA Guidelines requires circulation of a NOP for a minimum 30-day review period. In consideration of the current Coronavirus (COVID-19) pandemic, the City will be circulating the NOP for the proposed Housing Element for an extended 60 days. Please go to the City's webpage <https://www.santamonica.gov/housing-element-update> for the NOP and associated info on the Housing Element Update (including background on the Housing Element, State requirements, anticipated project schedule, notification lists). The City welcomes agency and public input during this period regarding the scope and content of environmental information that must be included in the Draft EIR. **Comments may be submitted, in writing, by 5:30 p.m. on December 31, 2020** and addressed to:

Rachel Kwok, Environmental Planner
E-mail: rachel.kwok@smgov.net

PUBLIC SCOPING MEETING: In an effort to reduce the risk of COVID-19, the City will hold a scoping meeting via teleconference on December 10, 2020 at 5:30 PM to describe the proposed project, the environmental review process, and to receive public comments on the scope of the EIR. City staff and the City's EIR consultant will participate via teleconference. Participants may join the teleconference via <https://primetime.bluejeans.com/a2m/live-event/bxxeeakf> or by dialing in at +1 (415) 466-7000 PIN is: 4050914#

Those wishing to give public comment for the meeting must make that request via email to Rachel.Kwok@smgov.net prior to 12 p.m. on the day of the meeting and will be posted online on the project's webpage. Written information received after 12 p.m. will be read aloud at the meeting for a total of three minutes. The City will consider all comments, written and oral, in determining the final scope of the evaluation to be included in the EIR.

ESPAÑOL: Este es un aviso de que la Ciudad está preparando un informe que describe los posibles efectos ambientales de un plan de vivienda, que puede ser de su interés. Para más información, llame a Carmen Gutiérrez al 310 458 8341.

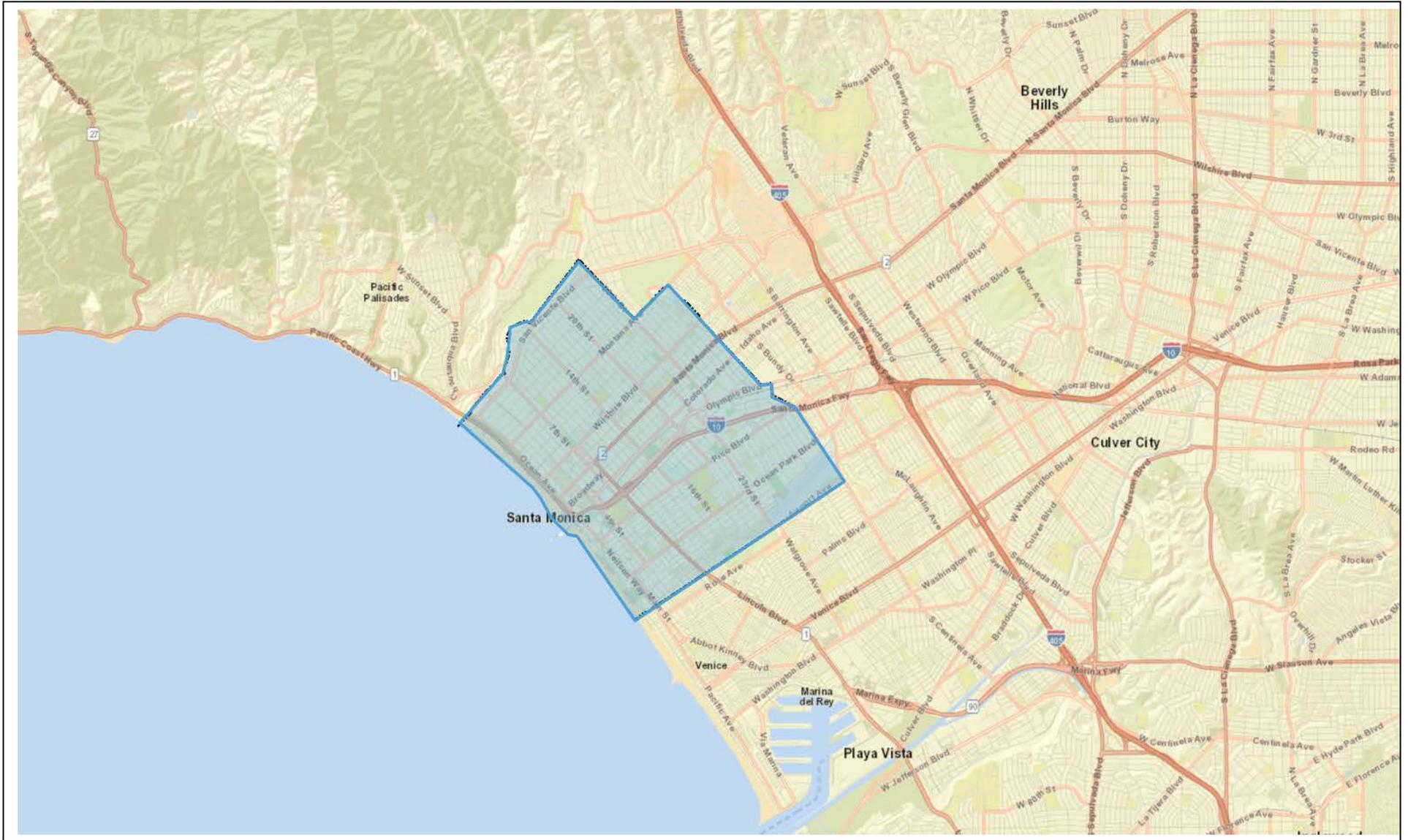


Figure 1: Project Map - City of Santa Monica Boundaries



6th Cycle Housing Element Update Environmental Impact Report Public Scoping Summary

The City of Santa Monica (City) published a Notice of Preparation (NOP) for the proposed 6th Cycle Housing Element Update (Project) on October 30, 2020 announcing the intent to prepare an Environmental Impact Report (EIR) and soliciting comments on the scope of the analysis to be provided in the EIR (see Attachment 1). The California Environmental Quality Act (CEQA) Guidelines require circulation of an NOP for a minimum 30-day review period; however, in consideration of the current Coronavirus (COVID-19) pandemic, the City circulated the NOP a period of 60 days, ending on December 31, 2020. The NOP also announced a virtual scoping meeting on December 10, 2020. The complete PowerPoint presentation is attached (see Attachment 2) and a complete audio/visual recording of the presentation can be found at: <https://www.santamonica.gov/housing-element-update>.

Scoping Meeting Summary

Presenters	Attendees
City of Santa Monica Rachel Kwok Ross Fehrmna Heidi von Tongeln Wood Environment & Infrastructure Solutions, Inc. Erika Leachman Nick Meisinger Dan Gira	Arlene Hopkins Bob Taylor Denny Zane Elizabeth Lerer Elizabeth Van Denburgh Ken Kutcher Lee Kaplan Mario Fonda-Bonardi Steven Spielberg Rick Gordon

Rachel Kwok, City of Santa Monica, Environmental Planner, provided a welcome to the virtual scoping meeting for the 6th Cycle Housing Element Update EIR and an introduction to the purpose and requirements of the proposed 6th Cycle Housing Element Update. Erika Leachman, Wood Environment & Infrastructure Solutions, Inc. (EIR Consultant), provided an overview of the purpose and requirements of the EIR, including a discussion of key environmental topics to be addressed in the EIR. Immediately following the presentation, the City received public comments on the proposed 6th Cycle Housing Element Update and the associated EIR. A summary of the comments received during the 60-day scoping period – including the comments received during the virtual scoping meeting – are provided below.

Commenter	Comment Number	Scoping Comment and City Response
Verbal Comments Provided During the Scoping Meeting		
Kenneth Kutcher, Santa Monica Housing Council	1-1	<p>Given the importance of the Project Description and the regulatory-driven nature of the proposed 6th Cycle Housing Element Update, will the Draft Project Description be provided ahead of the Environmental Impact Analysis?</p> <ul style="list-style-type: none"> The process for the development of the proposed 6th Cycle Housing Element Update is constrained by the schedule mandated by State Housing Element Law. In order to meet this schedule, the City must prepare the proposed 6th Cycle Housing Element Update as the EIR is being prepared simultaneously. However, the key elements of the Draft Project Description will be publicly available as a part of the parallel planning process, when it is presented to the Planning Commission in March/April 2021.
Mario Fonda-Bonardi	2-1	<p>When is the last time to provide scoping comments?</p> <ul style="list-style-type: none"> The City will receive scoping comments until December 31, 2020. As described during the scoping meeting presentation the CEQA Guidelines require circulation of an NOP for a minimum 30-day review period; however, in consideration of the current Coronavirus (COVID-19) pandemic, the City circulated the NOP a period of 60 days.
Mario Fonda-Bonardi	2-2	<p>How are Vehicle Miles Traveled (VMT) calculated? Is modeled VMT ever calibrated with observed VMT?</p> <ul style="list-style-type: none"> Fehr & Peers has been working with the City since the passage of Senate Bill (SB) 743 to develop and update the Traffic Demand Forecast Model (TDFM) to address and assess VMT throughout the City. Technical approaches using this model are described in detail in recent EIRs prepared for The Miramar and the Ocean Avenue Project. Fehr & Peers has also obtained anonymous location data derived from cell phone signals (e.g., Bluetooth), which has been used to infer the average distances between destinations (e.g., the distance between home and work). This data is used to calibrate the TDFM for individual areas throughout the City.
Mario Fonda-Bonardi	2-3	<p>How many alternatives will be studied and how will COVID-19 recovery distortion factor into the projection?</p> <ul style="list-style-type: none"> The CEQA guidelines require that an EIR study the No Project Alternative (i.e., the scenario in which neither the proposed Project nor any of the action alternatives are approved). However, CEQA does not mandate a specific number of action alternatives to be considered in an EIR. The range of action alternatives – which are intended to avoid or meaningfully reduce potentially significant impacts identified for the proposed Project – is malleable dependent upon the proposed Project and the range of potentially significant impacts that are identified. With regard to the COVID-19 pandemic, the City experienced a very immediate change in traffic and congestion early on – particularly after the issuance of stay-at-home orders by the State. Since that time, the traffic and congestion within the City have gradually returned to more normal conditions. Fehr & Peers expects

Commenter	Comment Number	Scoping Comment and City Response
		<p>that this trend will continue as stay at home orders are lifted and businesses return to more normal operations. The description of impacts provided in the EIR will be based on “normal” conditions and verifiable trends. The EIR cannot, and is not required to, speculate on substantial changes to business models or the wider economy.</p>
Mario-Fonda Bonardi	2-4	<p>What is the timeline for the buildout?</p> <ul style="list-style-type: none"> As described in the scoping meeting presentation, approximately 1,100 units would need to be produced each year to meet the approximately 8,800-unit allocation for the City. However, the Housing Element does not require build out, it simply requires the City to demonstrate that the existing land use designations, zoning code, and housing policies and programs, can accommodate the Regional Housing Needs Assessment (RNHA) allocation. Therefore, the EIR is not required to speculate on the timeline for full buildout. Instead, as required by CEQA, the EIR will consider a reasonable worst case when evaluating environmental impacts – meaning that the EIR will assess the development of approximately 8,800 units by 2045.
Elizabeth Van Denburgh, Wilmont Neighborhood Coalition	5-1	<p>When will the Suitable Sites Inventory (SSI) be available for review?</p> <ul style="list-style-type: none"> The overall schedule for the preparation of the proposed 6th Cycle Housing Element and the associated SSI are shown in the scoping meeting presentation. The key elements of the Draft Project Description will be publicly available during the Planning Commission hearing tentatively scheduled for March/April 2021.
Elizabeth Van Denburgh, Wilmont Neighborhood Coalition	5-2	<p>How will the capacity of accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs) be accounted for?</p> <ul style="list-style-type: none"> The City will consider ADUs and JADUs in the existing capacity for development. However, the City can only take credit for 5 times the previous production.

Written Comments Provided During the Scoping Period

Miya Edmonson, Caltrans December 1, 2020	6-1	<p>A transportation study will be prepared to evaluate VMT associated with the proposed 6th Cycle Housing Element Update. While parking is not specifically a CEQA issue (<i>Covina Residents for Responsible Development v. City of Covina [City Ventures, Inc., et al., Real Parties in Interest]</i> [2018] 21 Cal.App.5th 712), the transportation analysis provided in the EIR will assess consistency with adopted programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Section 3.12, <i>Transportation</i> will discuss the findings of transportation study and will consider Caltrans’ recommended mitigation measures to reduce VMT (i.e., Transportation Demand Management [TDM] ordinance and reduced parking requirements).</p>
Ann Hoover, December 3, 2020	7-1	<p>Section 3.11, <i>Utilities and Service Systems</i>, will provide a dedicated subsection that will describe the potential impacts to domestic water supply and infrastructure that could result from the implementation of the proposed 6th Cycle Housing Element. This analysis will rely on the findings of the Urban Water Management Plan (UWMP) update that is currently under preparation and/or a</p>

Commenter	Comment Number	Scoping Comment and City Response
		Water Supply Assessment (WSA) prepared for the proposed 6 th Cycle Housing Element Update.
	7-2	The intent of the proposed 6 th Cycle Housing Element Update is to provide additional housing units at variety of affordability levels consistent with the Regional Housing Needs Assessment (RHNA) allocation. The projects objectives associated with the 6 th Cycle Housing Element Update will be described in more detail in Section 2.0, <i>Project Description</i> and impacts on the available housing stock will be described in detail in Section 3.9, <i>Population and Housing</i> . Other issues related to community well-being (e.g., construction and operational air quality, noise, and transportation impacts) will be addressed in the relevant sections of the EIR including Section 3.3, <i>Air Quality</i> , 3.8, <i>Noise</i> , 3.12, <i>Transportation</i> . Similarly, issues related to aesthetics and visual resources will be addressed 4.0, <i>Other CEQA Considerations</i> . However, it is important to note that the EIR will programmatically evaluate the development of approximately 8,800 units by 2045. The EIR will not address individual residential and mixed-use development projects. Development under the proposed 6 th Cycle Housing Element Update will be considered and evaluated by the City on a project-by-project basis.
	7-3	Section 3.10, <i>Public Services and Recreation</i> will address the potential impacts of the proposed 6 th Cycle Housing Element Update on the City's parks, open space, and recreation facilities. The analysis will: 1) evaluate the availability of parks and recreational facilities in the City; 2) review any planned improvements or changes to these services; 3) analyze increases in demand for park and recreational services that would generate the need for new or expanded park and recreation facilities; and 4) determine whether adoption of the proposed 6 th Cycle Housing Element Update would cause significant physical environmental impacts. While the EIR will not be addressing the financial implications of the development or expansion of parks and recreation facilities, if necessary, the City Council will deliberate on these issues as they consider the adoption of the proposed 6 th Cycle Housing Element Update.
	7-4	As described in Scoping Comment Response 7-2, the intent of the proposed 6 th Cycle Housing Element Update is to provide additional housing units and at variety of affordability levels consistent with the RHNA allocation. While Chapter 2.0, <i>Project Description</i> describes the existing homeless population in Los Angeles County and the City as part of the purpose and need for the additional housing units, the intent of the CEQA analysis is to describe physical impacts on the environment. As such, Section 3.9, <i>Population and Housing</i> will analyze the potential for the proposed 6 th Cycle Housing Element Update to affect the City's existing housing stock. However, the City Council will deliberate on the issue of homelessness as they consider the adoption of the proposed 6 th Cycle Housing Element Update.
Kenneth Kutcher, Santa Monica Housing Coalition December 9, 2020	8-1	Section 2.0, <i>Project Description</i> , will contain an overview of the State Housing Element law, the RHNA allocation process, and the planning process undertaken by the City to accommodate the RHNA allocation under proposed 6 th Cycle Housing Element Update. The Project Description will clearly describe all components of the proposed 6 th Cycle Housing Element Update, including the SSI, proposed housing focus areas, and associated

Commenter	Comment Number	Scoping Comment and City Response
		implementing actions including, but not limited to plan, policy, and program amendments as well as any required zoning ordinance updates. The City recognizes that any implementing actions not considered in the EIR may require the preparation of subsequent environmental documentation consistent with the requirements of CEQA.
	8-2	Section 5.0, <i>Alternatives</i> , will evaluate a reasonable range of alternatives, including the No Project Alternative required by the CEQA Guidelines. The City will review the filing provided by the Santa Monica Housing Coalition that suggests alternatives focusing on the provision of housing in Downtown, Bergamot, the Boulevards, residentially zoned parking lots, and the LUCE's Activity Centers. The City will consider whether these suggested alternative(s) meets the requirements of CEQA to feasibly attain most of the basic project objectives and avoid or substantially reduce any of the significant effects associated with the proposed Project. Additionally, the City will also consider the suggested alternative to include a significant amount of new housing in existing residentially zoned neighborhoods, and whether this alternative meets the requirements of CEQA.
	8-3	The City recognizes the existing jobs-housing imbalance described in this comment. These issues will be discussed in Section 2.0, <i>Project Description</i> and Section 3.9, <i>Population and Housing</i> . Under State Housing Element law, the proposed 6 th Cycle Housing Element Update must demonstrate that there is adequate capacity within its jurisdictional boundaries to meet its RHNA allocation. As described in Scoping Comment Response 8-1, Section 2.0, <i>Project Description</i> will describe the planning process undertaken by the City to accommodate the RHNA allocation under proposed 6 th Cycle Housing Element Update. This will include a discussion of the City's intent to locate housing focus areas within the vicinity of multi-modal transit (e.g., Metro E Line [Expo]). Related physical environmental impacts associated with greenhouse gas (GHG) emissions and transportation will be described in Section 3.7, <i>Greenhouse Gas Emissions and Climate Change</i> and Section 3.12, <i>Transportation</i> , respectively.
Mario Fonda-Bonardi, December 10, 2020	9-1	Please refer to Scoping Comment Responses 2-3 and 8-2 regarding the discussion of alternatives in the EIR. The City will consider each of the four suggested alternatives in this comment and determine whether they meet the requirements of CEQA to feasibly attain most of the basic project objectives and avoid or substantially reduce any of the significant effects associated with the proposed Project.
	9-2	Potential physical environmental impacts related to the issues listed in the comment letter – including domestic water supply and infrastructure, energy demand (e.g., electricity, natural gas, a fuel use), criteria air pollutant emissions, transportation, demand for schools and other services (e.g., emergency response, open space and parks, population growth, noise, solid waste and recycling, housing displacement, noise, and cultural resources – are addressed in the applicable resource area in Section 3.0, <i>Environmental Impact Analysis and Mitigation</i> . Issues related to hydrology and water quality (e.g., flood control and tsunami exposure) as well as biological resources (e.g., urban forest) will be addressed in Section 4.0, <i>Other CEQA</i> . While the EIR will not be addressing the financial implications associated with the

Commenter	Comment Number	Scoping Comment and City Response
		development of new or expanded utilities, additional schools, or community services, if necessary, the City Council will deliberate on these issues as they consider the adoption of the proposed 6 th Cycle Housing Element Update.
Victoria Tang, CDFW December 30, 2020	10-1	<p>As described in the Initial Study (IS) (Section IV, <i>Biological Resources</i>), the proposed 6th Cycle Housing Element Update is not expected to result in any adverse effects to biological resources. As such, potential impacts to biological resources will be discussed in Section 4.0, <i>Other CEQA</i>.</p> <p>The proposed 6th Cycle Housing Element Update would facilitate urban infill development (e.g., redevelopment of underdeveloped sites), with no potential for impacts to the issues identified in this comment (e.g., conservation easements or mitigation lands, Los Angeles County Significant Ecological Areas [SEAs], wildlife corridors, natural communities, or aquatic resources). Potential impacts to urban forests associated with future residential or mixed-use development projects under the proposed 6th Cycle Housing Element would be addressed on a project-by-project basis (see Scoping Comment Response 10-4).</p>
	10-2	<p>As described in the Initial Study (Section IV, <i>Biological Resources</i>), given the urbanized character of the City, there is no potential for Plummer's mariposa lily (<i>Calochortus plummerae</i>) or any other sensitive plant to wildlife species to occur in the areas that would be affected by the proposed 6th Cycle Housing Element Update. Rather vegetation within the City is generally limited to landscaped turf, shrubs, and street trees. Therefore, City-wide spring-time surveys by a qualified botanist would not be required in support of the EIR for the proposed 6th Cycle Housing Element Update. Nevertheless, any future residential or mixed-use development projects under the proposed 6th Cycle Housing Element Update would be required to comply with CEQA by: 1) assessing the potential for special status plants and wildlife species to occur within the Project site; and 2) if found, identifying feasible mitigation measures to reduce potential impacts to a less than significant level.</p>
	10-3	<p>As described in the Initial Study (Section IV, <i>Biological Resources</i>), there are no blueline streams, riparian habitats, or wetland habitats within the City. Therefore, jurisdictional delineation of such features would not be required in support of the EIR for the proposed 6th Cycle Housing Element Update. Nevertheless, any future residential or mixed-use development projects under the proposed 6th Cycle Housing Element Update would be required to comply with CEQA by: 1) evaluating the specific project site for any jurisdictional features; and 2) if found, identifying feasible mitigation measures to reduce potential impacts to a less than significant level.</p>
	10-4	<p>As described in Scoping Comment Response 7-2, the EIR will programmatically evaluate the development of approximately 8,800 units by 2045 under the proposed 6th Cycle Housing Element Update. However, the EIR will not address individual residential or mixed-use development projects. Such development under the proposed 6th Cycle Housing Element Update will be considered and evaluated by the City on a project-by-project basis. While future residential and mixed-use development may include pruning or removal and replacement of street trees consistent with the policies of the City's Urban Forest</p>

Commenter	Comment Number	Scoping Comment and City Response
		Master Plan (2017), future applicants would be required to comply with existing regulatory requirements including the Migratory Bird Treaty Act (MBTA) and California Fish and Game Sections 3503, 3503.5, and 3513.
	10-5	As discussed in Scoping Comment Response 10-4, the EIR will programmatically evaluate the development of approximately 8,800 units by 2045 under the proposed 6 th Cycle Housing Element Update. However, the EIR will not address individual residential or mixed-use development projects. Such development under the proposed 6 th Cycle Housing Element Update will be considered and evaluated by the City on a project-by-project basis. While future residential or mixed-use development may include demolition or impacts on street trees that could support roosting habitat for bats, future applicants would be required to comply with existing regulatory requirements include the California Fish and Game Sections 4150. While unlikely given the urbanized character of the City, project-specific CEQA-compliant documentation required for individual residential and mixed-use developments would require bat-specific avoidance and/or mitigation measures, if potential habitat for bats is identified within a specific project site.
	10-6	As described in the IS (Section IV, <i>Biological Resources</i>), the proposed 6 th Cycle Housing Element Update is not expected to result in any adverse effects to biological resources. The proposed 6 th Cycle Housing Element Update would facilitate urban infill development (e.g., redevelopment of underdeveloped sites), with no potential for impacts to federally or state listed species, sensitive species, or regionally and locally unique species. Therefore, a biological baseline assessment would not be required in support of the EIR for the proposed 6 th Cycle Housing Element Update. Nevertheless, as described in Scoping Comment Response 10-2, any future residential or mixed-use development projects under the proposed 6 th Cycle Housing Element Update would be required to comply with CEQA by: 1) assessing the potential for special status plants and wildlife species to occur within the specific project site; and 2) if found, identifying feasible mitigation measures to reduce potential impacts to a less than significant level.
	10-7	As described in Scoping Comment Response 10-2, -3, and -6, given the urbanized character of the City, no City-wide biological resources surveys are required in support of the EIR for the proposed 6 th Cycle Housing Element. Nevertheless, the City would ensure that any future biological survey data related to special status species and natural communities collected at a project-level is submitted to CDFW as requested.
Ellis Raskin, December 31, 2020	11-1	In accordance with CEQA and the 2020 CEQA Guidelines, the EIR will focus on and address key direct, indirect, and cumulative environmental impacts associated with the adoption of the proposed 6 th Cycle Housing Element Update. The following environmental topic areas will be addressed within the EIR: Air Quality, Cultural/Historic Resources, Energy, Greenhouse Gas Emissions and Climate Change, Land Use and Planning, Noise, Population and Housing, Public Services and Recreation, Transportation and Circulation, Tribal Cultural Resources, and Utilities.

Commenter	Comment Number	Scoping Comment and City Response
	11-2	Section 3.9, <i>Population and Housing</i> will contain a detailed discussion of the proposed Housing Element's potential impacts on population and housing. The section will describe existing population, housing, and employment estimates, and analyze the potential for the proposed Housing Element to displace existing housing or residents in the City. To provide regional context, this section will analyze the estimated population, housing, and employment forecasts of land uses changes anticipated under the proposed Housing Element in comparison with existing and future projections for the City and region as a whole. The EIR will include any necessary mitigation measures as needed.
	11-3	Mitigation measures will be provided as necessary for potentially significant impacts consistent with CEQA Guidelines Section 15091. A Mitigation Monitoring and Reporting Program (MMRP) will be provided in the Final EIR. The suggested mitigation measure will be considered, as appropriate, in the EIR. However, it should be noted that CEQA requires an analysis of potential physical environmental effects. The economic impacts of a project are only subject to CEQA if those impacts cause physical impacts.
Elizabeth Van Denburgh, Wilmington Neighborhood Coalition December 31, 2020	12-1	Section 3.7, <i>Greenhouse Gas Emissions and Climate Change</i> will provide a comprehensive analysis of the proposed 6 th Cycle Housing Element Update and its consistency with the City's Climate Action & Adaptation Plan (CAAP). This analysis will consider the Climate Action objectives including Zero Net Carbon Buildings Objectives, Zero Waste Objective, and Sustainable Mobility Objectives. Where necessary, the EIR will identify or cross reference programmatic mitigation measures (e.g., programmatic mitigation measures identified in Section 3.3, <i>Air Quality</i> and Section 3.12, <i>Transportation</i>), to ensure consistency with all relevant City policies. Although the EIR will not address the financial implications of achieving CAAP objectives, the City Council will deliberate on these issues as they consider the adoption of the proposed 6 th Cycle Housing Element Update.
	12-2	Section 3.7, <i>Greenhouse Gas Emissions and Climate Change</i> will also provide a comprehensive analysis of the proposed 6 th Cycle Housing Element Update as it relates to Climate Adaptation. The analysis will consider Climate Ready Community Objectives, Water Self-Sufficiency Objectives, and Coastal Flooding Preparedness Objectives. Additionally, the EIR will consider the Vulnerability Assessment in the CAAP. As described in Scoping Comment Response 12-1, where necessary, the EIR will identify or cross reference programmatic mitigation measures (e.g., programmatic mitigation measures identified in Section 3.3, <i>Air Quality</i> , and Section 3.12, <i>Transportation</i>), to ensure consistency with all relevant City policies. Although the EIR will not address the financial implications of achieving CAAP objectives, the City Council will deliberate on these issues as they consider the adoption of the proposed 6 th Cycle Housing Element Update.

DEPARTMENT OF TRANSPORTATION
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*Making Conservation
 a California Way of Life.*

December 1, 2020

Rachel Kwok, Environmental Planner
 City of Santa Monica, Planning Division
 1685 Main Street, Mail Stop 28
 Santa Monica, California 90401

RE: City of Santa Monica Housing Element
 Update 2021-2029 – Notice of Preparation
 (NOP)
 SCH# 2020100575
 GTS# 07-LA-2020-03404
 Vic. LA Multiple

Dear Rachel Kwok,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. For the proposed 6th Cycle 2021-2029 Housing Element, the Southern California Association of Governments (SCAG) has determined that the City's draft regional housing needs allocation (RHNA) is 8,874 units, more than 5 times than the last cycle. The significant increase in the City's RHNA housing number is indicative of the severity of the current housing crisis. As part of the proposed 2021-2029 Housing Element, Santa Monica must demonstrate to the State that there is available capacity within its jurisdictional boundaries to meet its targeted RHNA number. Per State requirements, the City's proposed Housing Element would include the following components:

- A detailed analysis of the City's demographic, economic and housing characteristics. • An analysis of the barriers to producing and preserving housing.
- A review of the City's progress in implementing current housing policies and programs.
- An identification of goals, objectives, and policies, in addition to a full list of programs that will implement the vision of the plan.
- A list of sites (aka the Suitable Sites Inventory) that could accommodate new housing, demonstrating the City's ability to meet the quantified housing number established in the RHNA.

After reviewing the NOP, Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities. However, to accommodate the additional housing units and not induce demand for excessive Vehicle Miles Travelled (VMT), Caltrans recommends significantly reducing or eliminating car parking requirements. Research looking at the relationship between land-use, parking, and transportation indicates that car parking prioritizes driving above all other travel modes and undermines a community's ability to choose

6-1

public transit and active modes of transportation. For any community or city to better support all modes of transportation and reduce vehicle miles traveled, we recommend the implementation of a TDM ordinance, as an alternative to requiring car parking.

6-1 cont.

Caltrans looks forward to reviewing the forthcoming Draft Environmental Impact Report (DEIR) to confirm that the Project will result in a net reduction in VMT.

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2020-03404.

Sincerely,



MIYA EDMONSON

IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

From: [Ann Hoover](#)
To: [Rachel Kwok](#)
Cc: [Jing Yeo](#); [Ross Fehrman](#); [Cary Fukui](#); [Roxanne Tanemori](#); [Steve Mizokami](#)
Subject: Draft EIR - 6th Cycle 2021-2029 Housing Element - Scope
Date: Thursday, December 3, 2020 9:09:11 PM

EXTERNAL

Hi Rachel -

Was just quickly reviewing the NOP and think there are a few more areas of environmental impact it would be great if you called out, giving them their own categories -

- **WATER** - Water resources and infrastructure - critical enough to be in its own separate category. 7-1
- **OVERALL WELL-BEING** - this for a long time has been a strategic goal of Council, so how would the building of 8,873 new units impact this? So many things synergize to impact well-being, e.g., potential housing loss and affordability issues, loss of familiar buildings and businesses, loss of sunshine or views when taller/larger buildings are built, noise / air quality / dealing constantly with construction vehicles, traffic, etc..... 7-2
- **PARKS AND OPEN SPACE** - Santa Monica is park poor, with only 1.4 acres per 1000 residents vs. 3.5+ per 1000 residents in LA and a national recommendation of 5+ acres per 1000 residents. With 8,873 units added, the City likely would be adding at minimum 16,000 new residents. Where / how will the City - to at least be equal to LA in our park offerings - add 56 acres of new park / open space (3.5 acres x 16 new residents = 56 acres)? And how will it finance adding that new park / open space? 7-3
- **HOMELESSNESS** - Homelessness issues need to be factored in with questions considered such as -- Will building 8,873 add to our homeless population? Will units to provide homeless housing be counted towards RHNA? Baseline Qs to ask: (A) How many homeless does SM currently host? (around 900?); (B) Is Santa Monica hosting its "fair share" of the LA County homeless population? (C) If not, what is Santa Monica's fair share to take care of? (D) Once you've determined Santa Monica's fair responsibility, what is our goal vis a vis our population and is it, at least in some instances, to move our homeless into housing? (E) If so, do we currently have enough supportive housing to meet that goal? 7-4

Thanks so much for considering these comments and including these topics in the draft EIR. Take care and best wishes to you -

Ann Hoover
Production Technical Working Group volunteer
Resident, 24 years

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December 9, 2020

VIA E-MAIL

Rachel Kwok
Environmental Planner
City of Santa Monica
1685 Main Street, Mail Stop 28
Santa Monica, CA 90401

Re: EIR Scoping Comments
Housing Element Update (Sixth Cycle)
Our Client: Santa Monica Housing Council
Our File No. 639.67

Dear Ms. Kwok:

This letter is submitted on behalf of the Santa Monica Housing Council ("SMHC") in advance of the City's EIR scoping meeting on its 6th Cycle Housing Element Update. This letter contains SMHC's EIR scoping comments. SMHC urges the City to implement these comments in finalizing the scope of the Housing Element Update's EIR. As this letter indicates, SMHC's scoping comments are targeted at ensuring (1) a legally adequate EIR project description, (2) an EIR that satisfies CEQA's requirement that the EIR must study a reasonable range of alternatives, and (3) an EIR that embraces the environmental benefits of producing more housing in jobs-rich Santa Monica.

SMHC's scoping comments are as follows.

1. Project Description. The key component of an EIR is the project description. Under CEQA, the project description needs to provide a clear definition of the project to be studied. Under CEQA, an accurate, stable and finite project description is an indispensable prerequisite to a legally sufficient EIR project description. And an adequate EIR project description is of central importance to an EIR's legal adequacy. (*County of Inyo v. City of Los Angeles*, 71 Cal. App. 3d 185, 192 (1977); State CEQA Guidelines § 15124.)

Here, the "project" for EIR purposes is the City's draft 6th Cycle Housing Element Update. Under California Housing Element Law, a legally-required component of the City's Housing Element Update is a plan of actions that includes the specific action steps by which the City will achieve its RHNA allocation of 8,873 units during the 6th

8-1

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Cycle (2021-29). Under California Housing Element Law, these action steps must be specific in nature; vaguely worded “programs” will not satisfy the requirements of California Housing Element Law. (Gov’t Code § 65583(c)). Nor will they satisfy CEQA’s requirements as to the EIR’s project description. Absent the project description’s inclusion of the plan(s) of specific actions steps that will be taken to achieve the City’s RHNA allocation, the EIR will not be legally adequate under CEQA.

Moreover, including the specific action steps in the Housing Element EIR’s project description will ensure that, subsequent to adoption of the Housing Element Update, further CEQA review of the specific action steps when implemented will not be necessary. Presumably, the City will need to adopt (either parallel with or subsequent to adoption of the Housing Element Update) ordinances, specific plan amendments, LUCE amendments, and amendments to other laws (e.g., the Affordable Housing Production Program). The EIR for the Housing Element Update should anticipate such measures and study their effects. Absent such an approach, a second round of CEQA review of such implementation measures will cause further delay and likely prevent the City from achieving its RHNA allocation during the 6th Cycle.

8-1 cont.

2. Project Alternatives. In developing the EIR’s project alternatives, we urge the City to focus on alternative strategies for achieving the City’s RHNA allocation. Next week, SMHC will be filing with the City SMHC’s recommended action steps for the Housing Element Update. All of SMHC’s recommendations follow a strategy of focusing new housing in Downtown, Bergamot, the Boulevards, residentially-zoned parking lots, and the LUCE’s Activity Centers consistent with the LUCE’s overall strategy of focusing housing near jobs and transit while minimizing displacement of existing residents. This strategy presupposes that the City will adopt a Housing Element Update that includes a suitable sites inventory that accommodates its RHNA allocation as required by the California Housing Element Law. Consistent with this strategy, there are various alternatives that would place greater or lesser emphasis on the areas referenced above as targets for new housing development. SMHC urges the City’s EIR to study at least two or three versions of such a strategy.

8-2

The EIR also should study at least one alternative that includes a significant amount of new housing in existing residentially-zoned neighborhoods. To be crystal clear, SMHC opposes such an alternative strategy on policy grounds. And SMHC anticipates that in addition to the adverse effects of displacing existing Santa Monica residents (Pub. Res. Code § 21083(b)(3); State CEQA Guidelines § 15065(a)(4)), such an alternative could pose additional adverse effects on other aspects of the environment. Still, it should be studied in the EIR.

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In addition, we anticipate that some community members and/or organizations will advocate for a Housing Element Update that declines to include a plan of actions that will lead to a suitable sites inventory that satisfies the City's RHNA allocation. SMHC believes the City may, consistent with CEQA, "screen out" such an alternative on grounds of legal infeasibility because such a strategy would violate California Housing Element Law. (State CEQA Guidelines § 15126(a); *South County Citizens for Smart Growth v. County of Nevada*, 221 Cal. App. 4th 316, 327 (2013).) Nonetheless, SMHC has no objection to the EIR studying such an alternative provided the EIR addresses SMHC's comment below about environmental betterment and the environmental rationale for SCAG's RHNA allocation amongst its various jurisdictions.

8-2 cont.

3. Housing in Santa Monica and Environmental Betterment. SMHC is concerned that the City's conventional CEQA methodology may miss the important environmental fact that in jobs-rich/housing-poor Santa Monica, more housing (rather than less) will be beneficial environmentally--especially with respect to greenhouse gases and traffic.

In this regard, SCAG expressly opted to focus future housing growth in coastal cities like Santa Monica, closer to jobs and better served by transit, in apportioning its mandated share of the statewide housing need throughout the Southern California region. SCAG voted for a plan that prioritizes housing in coastal areas over an alternative that would have mandated more units in the Inland Empire because SCAG recognizes that coastal cities' anti-housing policies have harmed the environment by increasing commute times and carbon emissions. (Liam Dillon, *Coastal Cities Give in to Growth. Southern California Favors Less Housing in Inland Empire*, Los Angeles Times (Nov. 7, 2019), <https://www.latimes.com/california/story/2019-11-07/housing-building-density-zoning-coastal-inland-empire-southern-california-scag/>.)

8-3

This point is especially relevant in Santa Monica, where the jobs/housing imbalance is severe. According to SCAG, 2.2% of all jobs in Los Angeles County are located in Santa Monica, but the City is home to just 0.9% of the County's population. (S. Cal. Ass'n of Gov'ts: Profile of the City of Santa Monica (May 2019) at p. 3, <https://www.scag.ca.gov/Documents/SantaMonica.pdf>.) This jobs/housing imbalance has driven some of the highest residential rents in the country and contributes to growing economic inequality. (Jason Islas, *Lack of Housing Growth Compounding Inequality, Says CA Housing Dept.*, StreetsBlog LA (Jan. 6, 2017) <https://la.streetsblog.org/2017/01/06/lack-of-housing-growth-compounding-inequality-says-ca-housing-dept/>.) This jobs/housing imbalance contributes to the degradation of the environment since, when people find it necessary to commute long distances to their places of employment due to a lack of housing options near employment centers, carbon emissions increase. (Patrick Kallerman & Micah Weinberg, *Another*

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Inconvenient Truth: To Achieve Climate Change Goals, California Must Remove Barriers to Sustainable Land Use, Bay Area Council Econ. Inst. (Aug. 2016) at pp. 2-3, http://www.bayareaeconomy.org/files/pdf/Another_Inconvenient_Truth_BACEI16.pdf; Adam Nagourney & Conor Dougherty, *The Cost of a Hot Economy in California: A Severe Housing Crisis*, N.Y. Times (July 17, 2017), <https://www.nytimes.com/2017/07/17/us/california-housing-crisis.html>.)

8-3 cont.

In short, the City needs to avoid preparing a “cookie-cutter” EIR that assumes less housing is better for the environment. Such a conclusion would be contrary to the environmental basis of SCAG’s RHNA allocation amongst Southern California jurisdictions and would essentially be the CEQA version of climate-denial.

Very truly yours,



Kenneth L. Kutcher

KLK:akp

cc: David Martin
Jing Yeo
Lane Dilg
George S. Cardona
Steve Mizokami
Cary Fukui
Ross Fehrman
Heidi von Tongeln
Santa Monica City Council
Santa Monica Planning Commission

From: Rachel Kwok <Rachel.Kwok@SMGOV.NET>
Sent: Thursday, December 10, 2020 10:31 PM
To: Meisinger, Nick; Leachman, Erika
Subject: FW: EIR Scoping

CAUTION: External email. Please do not click on links/attachments unless you know the content is genuine and safe.

From: Jing Yeo <Jing.Yeo@SMGOV.NET>
Sent: Thursday, December 10, 2020 10:26 PM
To: Rachel Kwok <Rachel.Kwok@SMGOV.NET>
Subject: FW: EIR Scoping

Hey Rachel – please add this to EIR scoping comments for Housing Element Update.

From: Mario Fonda-Bonardi <mario@fbharchitects.com>
Sent: Thursday, December 10, 2020 4:58 PM
To: Jing Yeo <Jing.Yeo@SMGOV.NET>
Subject: EIR Scoping

EXTERNAL

Hi Jing

We should look at 4 -5 EIR scenarios

1. Do nothing: let market forces work with existing laws and resources
2. Redo the 5th cycle of about 1600 units
3. Analyze actual housing needs with agreed upon quantified targets and tweaks as necessary e.g. a realistic housing element using probable available land, timelines, financing, etc.
4. SCAG's 8873 units (6th cycle)

9-1

Each one of these options should be tested in a post covid world of different (3?) intensities

Perhaps we should add an intermediate 5th scenario e.g. 4400 units?

What we want to know is among other things

1. Water availability, price impact, reserve exhaustion, neutrality water infrastructure needed (desal? SMURF) etc
2. Power availability impact, including electric car impact, infrastructure needed, shading effects etc
3. Gas demand, gas infrastructure needed price escalation
4. Gasoline demand, smog pollution
5. Traffic overload, travel times, no net pm trips Vehicle miles traveled, gasoline infrastructure needed car pollution
6. School demand, infrastructure required
7. Fire and Safety demand, response times, infrastructure required

9-2

8. Flood control/ tsunami exposure
9. Open space requirements increase/cost
10. Commercial office/retail/restaurant areas needed for the increased population
11. Increased population demographics, diversity, income levels
12. Noise pollution short and longterm
13. Waste and recycling impacts including demolition/construction waste
14. Vacancy and surplus capacity available
15. Impact on existing housing removal and affordability
16. Historical/archeological resources effected
17. Urban forest impacts.
18. Beach/ocean water quality effects

9-2 cont.

Thanks

Mario Fonda-Bonardi AIA

Mario@fbharchitects.com

310-699-0374



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



December 30, 2020

Rachel Kwok
City of Santa Monica
1685 Main Street, Mail Stop 28
Santa Monica, CA 90401
rachel.kwok@smgov.net

Subject: Notice of Preparation of a Draft Environmental Impact Report for the Housing Element Update 2021-2029 Project, SCH #2020100575, City of Santa Monica, Los Angeles County

Dear Ms. Kwok:

The California Department of Fish and Wildlife (CDFW) has reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) from the City of Santa Monica (City; Lead Agency) for the Housing Element Update 2021-2029 Project (Project). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

Conserving California's Wildlife Since 1870

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Project Description and Summary

Objective: The Project proposes to update the Housing Element of the City's General Plan. Since 1969, California has required that all local governments (cities and counties) adequately plan to meet the housing needs of everyone in the community. One of the required elements of a General Plan is the Housing Element. The Housing Element serves as a guide for addressing the housing needs of all segments of the City's population. State law requires that communities prepare and update the Housing Element every eight years.

Housing needs are determined by the California Housing and Community Department, who decides what the numerical housing targets should be for each regional council of governments. Each council of government across the State then further allocates the Regional Housing Needs Allocation (RHNA) to every city and county within its jurisdiction. The RHNA is a targeted housing number. Cities and counties do not have to build this number of units, but rather they must plan for them and show that there is capacity to accommodate for this number of housing under current land use and development standards.

The City's draft RHNA allocation is 8,874 units. As part of the proposed Project, the City must demonstrate to the State that there is available capacity within its jurisdictional boundaries to meet its targeted RHNA number. Per State requirements, the Project would include the following components:

- A detailed analysis of the City's demographic, economic, and housing characteristics;
- An analysis of the barriers to producing and preserving housing;
- A review of the City's progress in implementing current housing policies and programs;
- An identification of goals, objectives, and policies, in addition to a full list of programs that will implement the vision of the plan; and,
- A list of sites (Suitable Sites Inventory) that could accommodate new housing, demonstrating the City's ability to meet RHNA allocation.

Location: The Project is located within the City of Santa Monica. The City is surrounded on three sides by the City of Los Angeles, including the westside communities of Brentwood, Mar Vista, Pacific Palisades, Venice, and West Los Angeles. The City comprises approximately 5,280 acres (approximately 8.25 square miles).

Comments and Recommendations

CDFW offers the comments and recommendations below to assist the City in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources.

Specific Comments

1) Suitable Sites Inventory. CDFW recommends the City prepare a map of the following areas if present within City boundary:

- Conservation easements or mitigation lands;
- U.S. Fish and Wildlife Service [Threatened & Endangered Species Active Critical Habitat](#)

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- (USFWS 2020);
- Los Angeles County Significant Ecological Areas (SEAs). [Los Angeles County Significant Ecological Areas](#) are officially designated areas within Los Angeles County identified as having irreplaceable biological resources (LACDRP 2019). These areas represent the wide-ranging biodiversity of Los Angeles County and contain some of Los Angeles County's most important biological resources;
 - Wildlife corridors;
 - Sensitive Natural Communities [see General Comment #1 (Biological Baseline Assessment)];
 - Aquatic and riparian resources including (but not limited to) rivers, channels, streams, wetlands, and vernal pools, and associated natural plant communities; and,
 - Urban forests, particularly areas with dense and large trees [see Comment # 5 (Loss of Bird and Raptor Nesting Habitat)].

10-1 cont.

CDFW recommends the City avoid sites that may have a direct or indirect impact on conservation easements or lands set aside as mitigation. CDFW recommends the DEIR include measures where future housing development facilitated by the Project mitigate (avoid if feasible) for impacts on biological resources occurring within SEAs and critical habitat, as well as mitigate for impacts on wildlife corridors, sensitive natural communities, aquatic and riparian resources, and urban forests.

- 2) Plummer's Mariposa Lily. According to [iNaturalist](#), there are multiple observations of Plummer's mariposa lily (*Calochortus plummerae*) within the City (iNaturalist 2020).
- a. Plummer's mariposa lily has a California Rare Plant Rank (CRPR) of 4.2. Plants with a CRPR of 1A, 1B, 2A, and 2B are rare throughout their range, endemic to California, and are seriously or moderately threatened in California. All plants constituting CRPR 1A, 1B, 2A, and 2B meet the definitions of rare under CEQA Guidelines section 15380 and are eligible for State listing (CNPS 2020). Some CRPR 3 and 4 species meet the definitions of rare under CEQA (CEQA Guidelines, §15380). Depending on the species and ranking, a CRPR species may be seriously threatened in the State. California Native Plant Society's (CNPS) [Rare Plant Ranks](#) page includes additional rank definitions (CNPS 2020). Impacts to rare plant species should be considered significant under CEQA unless they are mitigated below a level of significance.
 - b. Survey and Assessment of Potential Impacts. In preparation of the DEIR, CDFW recommends the City retain a qualified botanist to conduct multiple spring-time surveys of Plummer's mariposa lily throughout the City. The qualified botanist should be knowledgeable and have experience identifying southern California rare plants [see General Comments #1 (Biological Baseline Assessment)].

10-2.

In consultation with a qualified botanist, CDFW recommends the City assess the Project's potential direct and/or indirect, permanent, and/or temporary impacts on Plummer's mariposa lily. Direct impacts include loss of individual plants and seedbank. Indirect impacts include loss of habitat supporting Plummer's mariposa lily. The City should assess whether potential impacts to Plummer's mariposa lily may lead to population decline, restriction of species range, and extirpation of the species within the City, regionally, and State-wide.

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- c. Mitigation. CDFW recommends the DEIR include measures where future housing development facilitated by the Project fully avoids potential impacts to Plummer’s mariposa lily and habitat. Plummer’s mariposa lily and habitat should be avoided as part of the Suitable Sites Inventory. For unavoidable Project impacts, CDFW recommends the DEIR include measures where future housing development mitigates for impacts to Plummer’s mariposa lily and habitat. The City’s avoidance and mitigation measures should include effective, specific, enforceable, and feasible actions. 10-2 cont.

- 3) Biological Resources Survey. CDFW recommends the DEIR include measures where future housing development facilitated by the Project provides a project-level biological resources survey [see General Comments #1 (Biological Baseline Assessment)]. A biological resources survey should include identification and delineation of any rivers, streams, and lakes and their associated natural plant communities/habitats. This includes any culverts, ditches, storm channels that may transport water, sediment, pollutants, and discharge into rivers, streams, and lakes. 10-3

- 4) Nesting Birds. CDFW recommends the DEIR include measures where future housing development facilitated by the Project avoids potential impacts to nesting birds. Project activities occurring during the bird and raptor breeding and nesting season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. 10-4
 - a) Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Code of Federal Regulations, Title 50, § 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). It is unlawful to take, possess, or needlessly destroy the nest or eggs of any raptor.
 - b) CDFW recommends that measures be taken to fully avoid impacts to nesting birds and raptors. Ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating) and vegetation removal should occur outside of the avian breeding season which generally runs from February 15 through August 31 (as early as January 1 for some raptors) to avoid take of birds, raptors, or their eggs.
 - c) If impacts to nesting birds and raptors cannot be avoided, CDFW recommends the DEIR include measures where future housing development facilitated by the Project mitigates for impacts. CDFW recommends surveys by a qualified biologist with experience conducting breeding bird and raptor surveys. Surveys are needed to detect protected native birds and raptors occurring in suitable nesting habitat that may be disturbed and any other such habitat within 300 feet of the project disturbance area, to the extent allowable and accessible. For raptors, this radius should be expanded to 500 feet and 0.5 mile for special status species. Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

- 5) Loss of Bird and Raptor Nesting Habitat. The biggest threat to birds is habitat loss and conversion of natural vegetation into another land use such as development (e.g., commercial, residential, industrial). In the greater Los Angeles, urban forests and street

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trees, both native and some non-native species, provide habitat for a high diversity of birds (Wood and Esaian 2020). Some species of raptors have adapted to and exploited urban areas for breeding and nesting (Cooper et al. 2020). For example, raptors (*Accipitridae*, *Falconidae*) such as red-tailed hawks (*Buteo jamaicensis*) and Cooper's hawks (*Accipiter cooperii*) can nest successfully in urban sites. Red-tailed hawks commonly nest in ornamental vegetation such as eucalyptus (Cooper et al. 2020). According to iNaturalist, there are multiple observations of red-tailed hawks and Copper's hawks within the City.

- a. CDFW recommends the DEIR provide measures where future housing development facilitated by the Project avoids removal of any native trees, large and dense-canopied native and non-native trees, and trees occurring in high density (Wood and Esaian 2020). CDFW also recommends avoiding impacts to trees protected by the City's Heritage Tree Program and Tree Ordinance. CDFW also recommends avoiding impacts to understory vegetation (e.g., ground cover, subshrubs, shrubs, and trees).
 - b. If impacts to trees cannot be avoided, trees should be replaced to compensate for the temporal or permanent loss habitat within a project site. Depending on the status of the bird or raptor species impacted, replacement habitat acres should increase with the occurrence of a California Species of Special Concern. Replacement habitat acres should further increase with the occurrence of a CESA-listed threatened or endangered species.
 - c. CDFW recommends planting native tree species preferred by birds. This includes coast live oak (*Quercus agrifolia*) and California sycamore (*Platanus racemosa*) (Wood and Esaian 2020). CDFW recommends Audubon Society's [Plants for Birds](#) for more information on selecting native plants and trees beneficial to birds (Audubon Society 2020).
- 6) **Bats.** Numerous bat species are known to roost in trees and structures throughout Los Angeles County (Remington and Cooper 2014). In urbanized areas, bats use trees and man-made structures for daytime and nighttime roosts. Accordingly, CDFW recommends the DEIR provide measures where future housing development facilitated by the Project avoids potential impacts to bats.
- a) Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs., § 251.1). Project construction and activities, including (but not limited to) ground disturbance, vegetation removal, and any activities leading to increased noise levels may have direct and/or indirect impacts on bats and roosts.
 - b) CDFW recommends a project-level biological resources survey provide a thorough discussion and adequate disclosure of potential impacts to bats and roosts from project construction and activities including (but not limited to) ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating) and vegetation removal. If necessary, to reduce impacts to less than significant, a project-level environmental document should provide bat-specific avoidance and/or mitigation measures [CEQA Guidelines, § 15126.4(a)(1)].

10-4 cont.

10-5

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General Comments

- 1) Biological Baseline Assessment. An adequate biological resources assessment should provide a complete assessment and impact analysis of the flora and fauna within and adjacent to a project site and where a project may result in ground disturbance. The assessment and analysis should place emphasis upon identifying endangered, threatened, sensitive, regionally, and locally unique species, and sensitive habitats. Impact analysis will aid in determining any direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW recommends avoiding any sensitive natural communities found on or adjacent to a project. CDFW also considers impacts to Species of Special Concern a significant direct and cumulative adverse effect without implementing appropriate avoid and/or mitigation measures. A project-level environmental document should include the following information:
 - a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)]. An environmental document should include measures to fully avoid and otherwise protect Sensitive Natural Communities from project-related impacts. CDFW considers these communities as threatened habitats having both regional and local significance. Plant communities, alliances, and associations with a state-wide ranking of S1, S2, S3 and S4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting [Vegetation Classification and Mapping Program - Natural Communities](#) webpage (CDFW 2020a);
 - b) A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's [Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities](#) (CDFW 2018). Adjoining habitat areas should be included where project construction and activities could lead to direct or indirect impacts off site;
 - c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at a project site and within the neighboring vicinity. The [Manual of California Vegetation](#) (MCV), second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2009). Adjoining habitat areas should be included in this assessment where project activities could lead to direct or indirect impacts off site. Habitat mapping at the alliance level will help establish baseline vegetation conditions;
 - d) A complete, recent, assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by a project. CDFW's [California Natural Diversity Database](#) (CNDDDB) in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat (CDFW 2020b). An assessment should include a nine-quadrangle search of the CNDDDB to determine a list of species potentially present at a project site. A lack of records in the CNDDDB does not mean that rare, threatened, or endangered plants and wildlife do not occur in the project site. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review [CEQA Guidelines, § 15003(i)];

10-6

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- e) A complete, recent, assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California Species of Special Concern, and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of a project site should also be addressed such as wintering, roosting, nesting, and foraging habitat. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, may be required if suitable habitat is present. See CDFW's [Survey and Monitoring Protocols and Guidelines](#) for established survey protocol for select species (CDFW 2020c). Acceptable species-specific survey procedures may be developed in consultation with CDFW and the U.S. Fish and Wildlife Service; and,
- f) A recent wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of a proposed project may warrant periodic updated surveys for certain sensitive taxa, particularly if build out could occur over a protracted time frame or in phases.
- 2) Data. CEQA requires that information developed in environmental impact reports be incorporated into a database which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species and natural communities detected by completing and submitting [CNDDDB Field Survey Forms](#) (CDFW 2020d). The City should ensure data collected at a project-level has been properly submitted, with all data fields applicable filled out. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred.

10-6 cont.

10-7

Conclusion

We appreciate the opportunity to comment on the NOP for the Housing Element Update 2021-2029 to assist the City of Santa Monica in identifying and mitigating Project impacts on biological resources. If you have any questions or comments regarding this letter, please contact Ruby Kwan-Davis, Senior Environmental Scientist (Specialist), at Ruby.Kwan-Davis@wildlife.ca.gov.

Sincerely,

DocuSigned by:

5991E19EF8094C3...

Victoria Tang
Senior Environmental Scientist (Supervisory) for

Erinn Wilson-Olgin
Environmental Program Manager I

Rachel Kwok
City of Santa Monica
December 30, 2020
Page 8 of 8

ec: CDFW

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State Clearinghouse – State.Clearinghouse@opr.ca.gov

References

- Audubon Society. 2020. Plants for Birds. Available from:
<https://www.audubon.org/PLANTSFORBIRDS>
- [CDFWa] California Department of Fish and Wildlife. 2020. Natural Communities. Accessed at:
<https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities>.
- [CDFWb] California Department of Fish and Wildlife. 2020. California Natural Diversity Database. Available from: <https://wildlife.ca.gov/Data/CNDDDB>
- [CDFWc] California Department of Fish and Wildlife. 2020. Survey and Monitoring Protocols and Guidelines. Available from: <https://wildlife.ca.gov/conservation/survey-protocols>
- [CDFWd] California Department of Fish and Wildlife. 2020. Submitting Data to the CNDDDB. Available from: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>
- [CDFW] California Department of Fish and Wildlife. 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. Accessed at:
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>.
- [CNPS] California Native Plant Society. 2020. Rare Plant ranks. Available from:
<https://www.cnps.org/rare-plants/cnps-rare-plant-ranks>.
- Cooper D.S., Yeh, P.J., and D.T. Blumstein. 2020. Tolerance and avoidance of urban cover in a southern California suburban raptor community over five decades. *Urban Ecosystems*. doi.org/10.1007/s11252-020-01035-w
- iNaturalist. 2020. Plummer's Mariposa Lily (*Calochortus plummerae*). Available from: <https://www.inaturalist.org/taxa/75943-Calochortus-plummerae>
- [LACDRP] Los Angeles County Department of Regional Planning. 2019. Significant Ecological Areas Program. Maps. Available from: <https://planning.lacounty.gov/site/sea/maps/>
- Sawyer, J. O., Keeler-Wolf, T., and Evens J.M. 2009. *A Manual of California Vegetation*, 2nd ed. ISBN 978-0-943460-49-9.
- [USFWS] U.S. Fish and Wildlife Service. 2020. USFWS Threatened & Endangered Species Active Critical Habitat Report. Online Mapper. Available from:
<https://ecos.fws.gov/ecp/report/table/critical-habitat.html>
- Wood, E.M. and S. Esaian. 2020. The importance of street trees to urban avifauna. *Ecological Applications* 30(7): e02149.

December 31, 2020

City of Santa Monica
City Planning Division
c/o Rachel Kwok, Environmental Planner
1685 Main Street, Mail Stop 28
Santa Monica, California 90401
Via Email To: Rachel.Kwok@smgov.net

Re: Notice of Preparation of Draft Environmental Impact Report for the City of Santa Monica's 6th Cycle 2021-2029 Housing Element

Dear Ms. Kwok:

As we embark on the collaborative process of drafting an environmental impact (**EIR**) report to disclose, analyze, and mitigate the environmental effects of the 6th Cycle 2021-2029 Housing Element, I would like to take this opportunity to encourage you to give special attention to the significant, adverse environmental and human health impacts associated with housing displacement. We have a unique opportunity to inform the public of these impacts and to take proactive steps to mitigate these impacts.

In this letter, I will provide suggestions for analyzing housing displacement impacts within the scope of the EIR, consistent with the requirements of the California Environmental Quality Act (**CEQA**; Pub. Resources Code, § 21000 et seq.) and the State CEQA Guidelines (**Guidelines**; Cal. Code Regs., tit. 14, § 15000 et seq.). It is imperative that we provide meaningful disclosures of these impacts, and it is essential that we adopt effective mitigation to address these impacts.

I. Background Regarding Preparation of Environmental Impact Reports

"The EIR has been aptly described as the 'heart of CEQA.' [Citations.] . . . Its purpose is to inform the public and its responsible officials of the environmental consequences of their decisions before they are made. Thus, the EIR 'protects not only the environment but also informed self-government.' [Citation.]" (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564, original emphasis.) "The foremost principle under CEQA is that the Legislature intended the act 'to be interpreted in such manner as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language.' (*Friends of Mammoth v. Board of Supervisors* (1972) 8 Cal.3d 247, 259.)" (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 390.)

To be adequate, an EIR must do more than disclose a project's environmental impacts; it must also meaningfully evaluate the level of environmental significance of such impacts. (*Poet, LLC v. State Air Resources Bd.* (2017) 12 Cal.App.5th 52, 64; see *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 3 Cal.5th 497, 514-515 [an EIR must "reasonably describe the nature and magnitude of the adverse effect"]; § 21083, subd. (b).) This includes impacts that are "potentially" significant since CEQA defines "a significant environmental impact . . . as 'a substantial, or potentially substantial, adverse change in the environment.' " (*Vineyard Area*

11-1

Citizens for Responsible Growth, Inc. v. City of Rancho Cordova (2007) 40 Cal.4th 412, 448 & fn. 17, original emphasis, quoting § 21068; see § 21100, subd. (d).)

While “perfection” isn’t necessary, the EIR “must be ‘prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences.’ ” (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 712, quoting Guidelines, § 15151.) “The data in an EIR must not only be sufficient in quantity, it must be presented in a manner calculated to adequately inform the public and decision makers, who may not be previously familiar with the details of the project.” (*Vineyard*, 40 Cal.4th at 442.)

11-1 cont.

To enable government officials and the public to fully understand the environmental consequences of project approvals, and to further assure the public that those consequences have been taken into account, the EIR “must present information in such a manner that the foreseeable impacts of pursuing the project can actually be understood and weighed, and the public must be given an adequate opportunity to comment on that presentation before the decision to go forward is made.” (*Vineyard*, 40 Cal.4th at 449-450.)

II. The Scope of the EIR Must Include Adequate Disclosure, Analysis, and Mitigation of Human Health and Environmental Impacts Associated with Housing Displacement

CEQA requires agencies to evaluate the direct, indirect, and cumulative effects of housing displacement. (See Guidelines Appendix G, § XIV(b) [Requiring agencies to answer the question of whether a project will “[d]isplace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere”].) Likewise, CEQA mandates disclosure of a project’s direct and cumulative environmental effects on “human beings, either directly or indirectly.” (§ 21083, subd. (b)(3); Guidelines, § 15065, subd. (a)(4); see also *San Lorenzo Valley Community Advocates for Responsible Education v. San Lorenzo Valley Unified School Dist.* (2006) 139 Cal.App.4th 1356, 1372 [human health is among the many “environmental values” protected by CEQA and the Guidelines].)¹

11-2

The adverse environmental and human health impacts of gentrification and housing displacement are well understood by scholars and urban planners. Public health experts, sociological experts, and other public policy experts have published numerous articles, studies, and reports documenting the adverse environmental and human health effects caused by (and associated with) housing displacement. For example, when tenants are forced to move to faraway locations, residents are often forced to spend more time on the road commuting to their jobs. When tenants are forced to

¹ The fact that a project has or contributes to economic and social effects does not place it outside the purview of CEQA where, as here, its economic or social effects are “related to” a physical change. (Guidelines, § 15382; see also *id.*, § 15064, subd. (e) [(e)conomic or social changes may be used, however, to determine that a physical change shall be regarded as a significant effect on the environment”].)

spend more money on replacement housing, they may be forced to spend less money on other basic necessities, such as nutritious food or gas for heating.

Some relevant sources include:

- Community-level Effects of Displacement:
<https://www.urban.org/sites/default/files/publication/52311/900936-Community-level-Effects-of-Displacement.pdf>
- Bay Area Regional Health Inequities Initiative Analysis of Displacement Impacts:
https://bd74492d-1deb-4c41-8765-52b2e1753891.filesusr.com/ugd/43f9bc_bd2574436792441380ca1ae78beb94a3.pdf
- Impact of residential displacement on healthcare access and mental health among original residents of gentrifying neighborhoods in New York City:
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5741227>
- Can Curbing Gentrification Help Stop Climate Change?:
<https://theweek.com/articles/680154/curbing-gentrification-help-stop-climate-change>
- Homelessness and Housing Instability: The Impact on Education Outcomes:
https://www.tacomahousing.net/sites/default/files/print_pdf/Education/Urban%20Institute%20THA%20Homelessness%20and%20Education%202014-12-22.pdf
- Serial Forced Displacement in American Cities:
https://www.researchgate.net/publication/51161188_Serial_Forced_Displacement_in_American_Cities_1916-2010

11-2 cont.

The EIR should disclose the types of adverse environmental and human health impacts discussed in these sources when evaluating the effects of housing displacement in our city. In order for disclosures to be meaningful and informative, the EIR should provide data about neighborhoods and community demographics that have historically been burdened the most by the effects of housing displacement. Special emphasis should be placed on effects in the Pico Neighborhood.

We should also take this opportunity to find creative solutions to effectively mitigate the adverse environmental and human health effects of housing displacement. "A public agency shall provide that measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, or other measures." (Pub. Resources Code, § 21081.6, subd. (b); see Guidelines, §§ 15091, subd. (d), 15126.4, subd. (a)(2).) When making the findings required by Public Resources Code section 21081, subdivision (a)(1), to the effect that changes have been required in or incorporated into a project, mitigating or avoiding each significant effect identified in the final EIR, "[t]he public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." (Pub. Resources Code, § 21081.6, subd. (a)(1).) "The reporting or monitoring program shall be designed to ensure compliance during project implementation." (*Id.*)

11-3 cont.

Mitigation measures must be "required in, or incorporated into" the project. (Pub. Resources Code, § 21081, subd. (a)(1); *Federation of Hillside and Canyon Assoc. v. City*

of Los Angeles (2000) 83 Cal.App.4th 1252,1261.) Deferral of the analysis of the feasibility and adoption of mitigation measures violates CEQA. (*Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296,306-308.)

Here, the EIR should incorporate creative and meaningful mitigation measures, including the following:

- Preserving, to the greatest extent possible, the city's rent-controlled housing stock and adopting strategies to keep residents in their homes. The Rent Control Board should be empowered, to the greatest extent feasible, to enact programs that alleviate rent burdens for tenants in controlled units and to preserve the existing supply of rent controlled housing in the city.
- Expanding city rent subsidy programs, including the potential re-allocation of affordable housing impact fees to rent subsidy programs. By way of illustration, the cost of building one affordable unit (approx. \$600,000, by some estimates) could be distributed to 100 families to subsidize \$500 in rent every month.
- Finding creative methods of financing the construction of affordable housing. The adoption of a land value tax is one strategy that should be seriously considered for accomplishing this goal.
- Extending affordability covenants at units that will expire in the near future.
- Ensuring that tenants receive the greatest possible relocation benefits, including interim housing when tenants are offered an opportunity to return following reconstruction projects.

11-3 cont.

By incorporating these mitigation measures, we can help build a more just and equitable future for our city. Thank you very much for your consideration, and please do not hesitate to contact me if you have questions.

Best,



Ellis Raskin, Esq.



December 31, 2021

Ms. Rachel Kwok

Environmental Planner

City of Santa Monica – City Planning Division

1685 Main Street

Santa Monica, California 90401

Re: Input on the Scope of the Housing Element 2021-2019 EIR

Ms. Kwok,

As outlined in your December 10, 2020 2021-2029 Housing Element EIR Public Scoping Meeting document, scoping comments should focus on the potential environmental impacts of the proposed 2021-2029 Housing Element. Given that City of Santa Monica Climate Action & Adaptation Plan (CAAP) - A 2030 Community Plan to Reduce Carbon Emissions & Become Climate Resilient was finalized in May 2019. I reviewed this plan to determine what impacts, actions and costs should be addressed in the scoping of this EIR to achieve the CAAP by 2030.

The scoping of the 2021-2019 Housing Element EIR needs to ask and determine the impact and associated mitigations and costs to the City/residents of the allocated 8,873 units with more than 69% needing to be affordable housing upon the 2030 Climate Action and Climate Adaptation objectives.

First, the GAAP is a guiding document to achieve an 80% reduction of emissions by 2030, 1 year after the completion of this Housing Element. **The EIR scoping must ask the questions and identify the mitigations and costs to achieve the following Climate Action objectives outlined in the GAAP.**

CLIMATE ACTION (to achieve 80% reduction in emissions by 2030)

- Zero Net Carbon Buildings Objectives
 - Achieve 100% renewable grid electricity
 - Install 100 MW of local solar energy
 - Reduce fossil fuel use 20% in existing buildings
 - Discourage fossil fuels in new buildings
- Zero Waster Objective
 - Divert 95% of materials from landfills
- Sustainable Mobility Objectives

12-1



- Convert 50% of local trips to foot, bike, scooter & skateboard
- Convert 25% of commuter trips to transit
- Convert 50% of vehicles to electric or zero emission

12-1 cont.

Second, the GAAP is also a guiding document to increase Santa Monica’s resilience to climate change hazards and impacts. **The EIR scoping must also ask the questions and identify the mitigations and costs to achieve the following Climate Adaptation objectives outlined in the GAAP.**

CLIMATE ADAPTATION (to increase Santa Monica’s resilience to climate change hazards and impacts)

- Climate Ready Community Objectives
 - Increase community resilience to climate change
 - Protect vulnerable groups from impacts
 - Integrate climate change impacts into City planning, operations & infrastructure projects
- Water Self-Sufficiency Objective
 - Achieve water self-sufficiency by 2023
- Coastal Flooding Preparedness Objectives
 - Enhance natural systems to prevent damage from coastal flooding
 - Increase resilience of public and private assets in the coastal flood zone
- Low Carbon Food & Ecosystems Objectives
 - Increase self-reliance through local food production
 - Reduce or sequester carbon emissions from food production, consumption, waste and landscape management and natural processes

12-2

Finally, in addition to Climate Action and Climate Adaptation objectives, the GAAP outlines a Vulnerability Assessment of people, buildings, infrastructure, and the economy which will be affected by not addressing climate change. These elements of vulnerabilities (people, buildings, infrastructure, economy) should be included in the EIR scoping to determine the impact and what mitigation and associated costs will need to be incurred to address these vulnerabilities by community sector e.g., parks, water infrastructure, urban forests for 8,873 housing units.

Thank-you for your time and we look forward to the answers from our Q&A session at the December 10, 2020 meeting.

Sincerely,

Elizabeth Van Denburgh

Wilshire Montana Neighborhood Coalition (Wilmont)

Wilmont Chair

**CITY OF SANTA MONICA
INITIAL STUDY**

1. Project title:

City of Santa Monica 6th Cycle 2021-2029 Housing Element Update

2. Lead agency name and address:

City of Santa Monica
Planning & Community Development Department
1685 Main Street
Mail Stop 28
Santa Monica, CA 90401

3. Contact person and phone number:

Rachel Kwok, Environmental Planner
Planning & Community Development Department
(310) 458-8341

4. Project location:

City-wide

5. Project applicant/sponsor's name and address:

City of Santa Monica
Planning & Community Development Department

6. General plan designation:

Various – City-wide

7. Zoning:

Various – City-wide

8. Description of project (attach additional pages as necessary):

See attached Project Description.

9. Surrounding land uses and setting:

Various – City-wide

10. Project approvals required (e.g., development review permits, conditional use permits, or development agreements.)

- Certification of Housing Element Update by the California Department of Housing and Community Development Department (HCD).
- Amendments to the Land Use and Circulation Element (LUCE).
- Amendments to the Downtown Community Plan (DCP).
- Amendments to the Bergamot Area Plan.
- Implementing Zoning and/or Parking Ordinance amendments (City Council).
- Acquisition of public land for the development of housing.
- Consideration of private development entitlement requests (e.g., tentative subdivision maps, design review, and use permits) and other requests for infrastructure improvements consistent with the proposed Housing Element Update.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

<input type="checkbox"/>	Aesthetics/Shadows	<input type="checkbox"/>	Agriculture and Forestry Resources	<input checked="" type="checkbox"/>	Air Quality
<input type="checkbox"/>	Biological Resources	<input checked="" type="checkbox"/>	Cultural Resources	<input checked="" type="checkbox"/>	Energy
<input checked="" type="checkbox"/>	Greenhouse Gas Emissions	<input type="checkbox"/>	Geology/Soils	<input type="checkbox"/>	Hazards & Hazardous Materials
<input type="checkbox"/>	Hydrology/Water Quality	<input checked="" type="checkbox"/>	Land Use/Planning	<input type="checkbox"/>	Mineral Resources
<input checked="" type="checkbox"/>	Noise	<input checked="" type="checkbox"/>	Population/Housing	<input checked="" type="checkbox"/>	Public Services
<input checked="" type="checkbox"/>	Recreation	<input checked="" type="checkbox"/>	Transportation	<input checked="" type="checkbox"/>	Tribal Resources
<input checked="" type="checkbox"/>	Utilities/Service Systems	<input type="checkbox"/>	Wildfire	<input type="checkbox"/>	Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Rachel Kwok
Environmental Planner

Date

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Produce extensive shadows affecting adjacent uses or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) **Less Than Significant Impact.** Public scenic vistas and view corridors provide views of valued resources, such as the ocean and distant mountain ranges. Major scenic vistas in the City of Santa Monica (City) are those associated with the Pacific Ocean, Santa Monica State Beach, Santa Monica Pier, Santa Monica Mountains, and the bluffs. The City’s LUCE includes policies intended to preserve public view corridors, including western views of the ocean from east-west streets and boulevards, public views of the ocean and the Pier from Palisades Park, and public views of the City from the Pier. The City’s 2018 Land Use Plan (LUP) of the Local Coastal Program also identifies and designates View Corridors and Vantage Points to be protected as community assets.

Implementation of the proposed Housing Element Update would plan for new residential development, some of which could occur in proximity to scenic vistas. New residential development planned for under the proposed Housing Element Update may result in new taller structures than currently exist. However, these new buildings would occur on infill sites and would not occur on vacant parcels that provide public scenic vistas throughout the City. New residential development planned for under the proposed Housing Element Update would remain subject to existing City goals, policies, or programs related to the protection of public scenic vistas. Therefore, impacts on scenic vistas would be *less than significant*.

b) **Less Than Significant Impact.** There are no State-designated scenic highways in the City. State Route (SR-) 1 (Pacific Coast Highway) to the west of the Downtown is eligible for State scenic highway designation, but it is not currently designated as scenic by the State. Therefore, impacts on State-designated scenic highways would be less than significant. However, as previously described, the City’s 2018 LUP of the Local Coastal Program identifies and designates View Corridors and Vantage Points to be protected as community assets. The 2018 LUP also discusses scenic open space, such as the public landscape along Ocean Avenue and public art, as among the City’s visual resources. Although implementation of the proposed Housing Element Update would result in new residential development, future residential development projects in the City would occur within existing infill sites and would comply with the existing policies set forth in the City’s LUCE and the 2018 LUP that protect the City’s valued scenic

resources (e.g., Santa Monica Pier and the coral trees along San Vicente Boulevard and Olympic Boulevard). Further, new residential development planned for under the proposed Housing Element Update would be subject to the regulations of the Santa Monica Municipal Code (SMMC), including the Landmarks Ordinance (SMMC Chapter 9.56), which protects scenic historic resources (including Landmark trees) as well as the Tree Ordinance (SMMC Chapter 7.40), which protect public trees. Further, existing City goals, policies, or programs related to the protection of scenic highways would remain applicable to new residential development projects under the proposed Housing Element Update. Therefore, impacts on scenic resources would be *less than significant*.

c) **Less Than Significant Impact.** Implementation of the proposed Housing Element Update would facilitate the development of new residential development. As provided in the California Environmental Quality Act (CEQA) (Public Resources Code, Section 21099, amended by Senate Bill 743), if an infill residential development project is located within a transit priority area (TPA), aesthetic impacts shall not be considered significant impacts on the environment. Almost the entire City (with the exception of a small portion located along San Vicente Boulevard and near the Santa Monica Municipal Airport [SMO]) is designated as a TPA. All of the sites identified in the Suitable Sites Inventory (SSI) associated with the proposed Housing Element Update are located within the City's TPA. Therefore, pursuant to Public Resources Code Section 21099, aesthetic impacts of new residential development projects occurring in the City's TPAs are considered less than significant.

Further, future residential development projects under the proposed Housing Element Update would be required to comply with existing policies and standards governing scenic quality, including those set forth in the Santa Monica General Plan Land Use and Circulation Element (LUCE), applicable area and specific plans (e.g., Downtown Community Plan [DCP] and Bergamot Area Plan), Open Space Element, Urban Forest Master Plan, 2018 LUP of the Local Coastal Program, and the Zoning Ordinance (Divisions 1 through 5 of Article 9 of the SMMC). New development projects under the proposed Housing Element Update would be subject to design review either at the staff level and/or the City's Architectural Review Board (ARB) to ensure compliance with State, regional, and City policies and standards governing scenic quality. As required by the ARB, residential development projects within the City would be required to meet the City's development and design standards regarding site design and architecture. As stated, the mission of the ARB is to *"preserve existing areas of natural beauty, cultural importance and assure that buildings, structures, signs or other developments are in good taste, good design, harmonious with surrounding developments, and in general contribute to the preservation of Santa Monica's reputation as a place of beauty, spaciousness and quality."* As such, given that new residential development projects under the proposed Housing Element Update would occur within an urbanized area and would be subject to City staff and/or ARB review to ensure compliance with regulations/standards governing scenic quality, impacts on scenic quality would be *less than significant*.

d) **Less Than Significant Impact.** Given the urbanized nature of the City, there are numerous existing sources of light and glare. Sources of glare in the City occur with the reflection of sunlight from polished surfaces, such as window glass or reflective materials, or potentially from broad expanses of light-colored surfaces on building windows and facades. Existing light-generating uses in the City include exterior and interior lighting of various residential and commercial buildings, streetlights, and signage lighting. Vehicles, particularly headlights, are also sources of light and glare.

Potential new sources of glare associated with new residential development planned for under the proposed Housing Element Update would consist of glazing (i.e., windows) on the façades and other reflective materials used in the façade of the proposed structure. However, SMMC Section 9.21.120 (Reflective Materials) requires that no more than 25 percent of the surface area of any façade on any new building contain black or mirrored glass or other mirror-like material that is highly reflective. Further, to ensure compliance with the SMMC, new development projects would be subject to design review either at the staff level and/or the ARB to ensure compliance with SMMC Section 9.21.120.

With regard to new lighting, the potential development of new residential development projects would generate new sources of light in the City. However, such lighting levels are anticipated to be consistent with existing

development in the City. All outdoor lighting would be required to comply with SMMC Section 9.21.080, which sets height, shielding, and other standards for new and replacement lighting on residential and nonresidential buildings, as well as parking lots and structures. As such, new lighting fixtures associated with new residential development planned for under the proposed Housing Element Update would be shielded so as not to produce obtrusive glare onto the public right-of-way or adjacent properties. Therefore, impacts due to light/glare would be **less than significant**.

e) **Less Than Significant Impact.** Facilities and operations considered sensitive to the effects of shading include solar collectors; residential uses; primarily outdoor-oriented retail uses (e.g., certain restaurants); or routinely useable outdoor spaces associated with recreational, institutional (e.g., schools), or residential land uses. These uses are considered sensitive because sunlight is important for function, physical comfort, and/or commerce. In the City, shadow effects are magnified during the winter, when the sun’s lower position in the sky creates longer shadows. Winter is also when maximum solar access is more crucial to solar energy and passive heat production.

Implementation of the proposed Housing Element Update would plan for new housing, some of which could occur in proximity to shadow sensitive receptors (e.g., residential units, solar collectors, etc.). New residential development planned for under the proposed Housing Element Update may result in new structures that are taller than currently existing structures on-site. Potential shading effects of new buildings on shadow sensitive receptors would vary widely depending upon location, time of day and year, surrounding use (e.g., surface parking and height of existing structures), and building design (i.e., height, mass, etc.) of an individual residential development project. For some residential development projects, shading effects on an adjacent shadow sensitive use may exceed 3 hours particularly in the winter. However, all of the sites identified in the SSI associated with the proposed Housing Element Update are located within the City’s TPA. Therefore, pursuant to Public Resources Code Section 21099, aesthetic impacts of new infill development projects under the proposed Housing Element occurring in the City’s TPA are considered **less than significant**.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997), prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p>				
<p>a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a-e) **No Impact.** There are no agricultural uses, agricultural land, or forest land in the City. The City is fully developed with urban uses and is not utilized or zoned for agricultural or forestry resources. Consequently, the proposed Housing Element Update would not result in conversion of farmland to non-agricultural uses or the loss of forest land. **No impact** on agricultural resources or forestry resources would occur as a result of implementation of the proposed Housing Element Update.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a-d) **Potentially Significant Impact.** The City is located within the South Coast Air Basin (Basin), which is in nonattainment under Federal and State air quality standards for several criteria air pollutants. The proposed Housing Element Update would plan for new residential development that would generate air pollutant emissions, and as such, could conflict with an applicable air quality plan, exceed criteria pollutant thresholds, expose sensitive

receptors, or adversely affect substantial numbers of people. Therefore, these issues will be analyzed further in an EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands, (including, but not limited to, marsh, vernal pool, coastal wetlands, etc.), through direct removal, filling, hydrological interruption or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a-d, f) **No Impact.** There are no riparian or sensitive habitats known to occur in the City. The City has little undisturbed native vegetation. In addition, there are no blueline streams or wetland habitat within the City. The City is not recognized as an existing or proposed Significant Ecological Area (SEA) that links wildlife populations. No habitat conservation plans, natural community conservation plans, or other approved local, regional, or State habitat conservation plans apply to the City. Consequently, the proposed Housing Element Update would not affect any sensitive habitats or sensitive species, wetlands, or SEA. **No impact** on sensitive habitats, wildlife population, wetlands, migratory wildlife, and habitat conservation areas would occur.

e) **Less Than Significant Impact.** Implementation of the proposed Housing Element Update would plan for new residential development, some of which could require the removal of existing City trees. New development under

the proposed Housing Element Update could occur in proximity to existing City trees potentially resulting in removal or damage of trees. However, all street trees are protected and maintained in place during construction in accordance with the requirements of the City’s Tree Code (SMMC Section 7.40.160) and the Urban Forest Master Plan. Compliance with City regulations would be addressed on a project-by-project basis. Therefore, impacts would be *less than significant*.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a-c) **Potentially Significant Impact.** New residential development under the proposed Housing Element Update could cause adverse changes to historical and archaeological resources within the City. While unlikely, such development could also disturb buried human remains. Therefore, these issues will be analyzed further in an EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy. Would the project:				
a) Result in potentially significant wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a-b) **Potentially Significant Impact.** New residential development planned for under the proposed Housing Element Update could result in potentially significant wasteful energy consumption or conflict with an adopted energy plan. Therefore, these issues will be analyzed further in an EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death, involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a-i, ii, iii) **Less Than Significant Impact.** There are numerous earthquake faults in Southern California, including active, potentially active, and inactive faults, and the area is underlain by several buried (i.e., blind) thrust faults. Based on criteria established by the California Geological Survey (CGS), active faults are those that have shown evidence of movement within the past 11,700 years (i.e., Holocene Age). Potentially active faults are those that have shown evidence of movement between 11,700 and 1.6 million years ago (i.e., Pleistocene Age). Inactive faults are those that have not exhibited displacement within the last 1.6 million years. Buried thrust faults are faults without a surface expression but are a significant source of seismic activity. They are typically defined based on the analysis of seismic wave recordings of hundreds of small and large earthquakes in the Southern California area. Due to the buried nature of these thrust faults, their existence is usually not known until they produce an

earthquake.

The closest known fault in the City is the Santa Monica Fault, which is comprised of various segments with several strands that cross through the City. The westernmost segment (Segment 1) begins where the Santa Monica Fault comes onshore at Pacific Palisades and extends to the northeast towards Santa Monica Canyon, primarily as a single trace. Segment 2 is much wider and consists of several strands trending east through the City and south of Brentwood Knoll. Segments 3 and 4 trend more northeasterly and are expressed as a semi-continuous series of linear scarps in the older alluvial fan deposits, with Segment 4 specifically paralleling Santa Monica Boulevard as it enters the Cheviot Hills. East of the Cheviot Hills and the West Beverly Hills lineament, Segment 5 is mapped as a single trace in the Benedict Canyon Wash alluvial plain trending to the northeast towards the mapped location of the buried Salt Lake Fault.

The Santa Monica Fault system is characterized with an oblique left-lateral strike-slip movement with calculated minimum dip-slip only rates of approximately 0.5 to 0.6 millimeters per year (mm/year) to approximately 1.0 mm/year based on mechanical models of the faults in the Los Angeles Basin. In January 2018, the CGS established Alquist-Priolo Fault Zones around the Santa Monica Fault.

Future residential development planned for under the proposed Housing Element Update could occur near the Santa Monica Fault. The State does not prohibit housing in an active fault zone, but instead requires that structures built for human occupancy be assessed for potential fault rupture risks. Consistent with State requirements, the City's Building and Safety Division requires the submittal of a Fault Rupture Study to assess potential fault rupture, groundshaking, and liquefaction risks of a site and identify measures as necessary to mitigate such risks. Additionally, the design and construction of new buildings are required to be engineered to withstand the seismic ground acceleration that may occur during an earthquake, pursuant to the Santa Monica Building Code (SMBC), which incorporates applicable provisions of the California Building Code (CBC). The City also requires new buildings to submit a Design-Level Geotechnical Report to the City's Building and Safety Division prior to building permit issuance in accordance with the requirements of the City's Guidelines for Geotechnical Reports. All recommendations and design features in the Design-Level Geotechnical Report must be incorporated into the building design to minimize seismic hazards. Therefore, impacts would be *less than significant*.

a-iii) **Less Than Significant Impact.** Liquefaction occurs when ground shaking transforms granular material from a solid state to a liquefied state due to earthquake. These soils may acquire a high degree of mobility and lead to structurally damaging deformations. Liquefaction begins below the water table, but after liquefaction has developed, the groundwater table will rise and cause the overlying soil to mobilize. Liquefaction typically occurs in areas where the groundwater is less than 30 feet from the surface and where the soils are composed of poorly consolidated fine to medium sand. The CGS Seismic Hazard Zone Map that covers the City identifies the beach front areas and a small eastern portion of the City between Olympic Boulevard and Pearl Street as having liquefaction risk. According to the City's Safety Element Geologic Hazards map, there is varying potential for liquefaction in the following areas of the City:

- Along the beach;
- From the beach, inland to the southwest corner of the city to Marine Park following the lowlands along Lincoln Boulevard; and
- In the northern industrial corridor.

The proposed Housing Element Update could result in future residential development in liquefaction areas. Liquefaction risks are addressed through the City's building permit process. The design and construction of new buildings are required to be engineered to address potential liquefaction risks pursuant to the SMBC and CBC. Additionally, the City requires developers of new buildings to submit a Design-Level Geotechnical Report in accordance with the requirements of the City's Guidelines for Geotechnical Reports. The Geotechnical Report is

required to include a site-specific soils investigation to determine liquefaction potential on the site. All recommendations and design features in the Design-Level Geotechnical Report must be incorporated into the building design prior to building permit issuance to minimize liquefaction risks. Therefore, impacts would be **less than significant**.

a-iv) **Less Than Significant Impact.** The main areas of landslide concern within the City are confined to the areas along SR-1 below the Palisades bluffs, at the southwestern edge of the City. The City has implemented a number of projects in the past decade to reduce landslide risks and soil instability at the bluffs including the California Incline Bridge Replacement Project and the Santa Monica Palisades Bluff Stabilization Project. The geotechnical reports for these two projects were submitted to the California Coastal Commission, California Department of Transportation (Caltrans), and the City, and each agency concluded that the planned construction improvements on the bluff would be safe and not cause or contribute to erosion or degradation of geologic stability. In addition, several slope stabilization and dewatering measures have been implemented by the City, which has decreased the rate of erosion and improved the stability of the bluffs. As a result of these measures, landslide risks below the bluffs are considered low.

The properties in the northern portion of the City (near the Santa Monica Mountains) and in the Bryn Mawr Avenue residential area near Marine Park are characterized by steeper slopes. The design and construction of new buildings in these areas are required to be engineered to minimize landslide risks and soil instability, pursuant to the SMBC and CBC. The City also requires new buildings to submit a Design-Level Geotechnical Report prior to building permit issuance in accordance with the requirements of the City’s Guidelines for Geotechnical Reports. All recommendations and design features in the Design-Level Geotechnical Report must be incorporated into the building design to minimize landslide and soil collapse hazards. Therefore, impacts would be **less than significant**.

b-d) **Less Than Significant Impact.** The construction of new residential development planned for in the proposed Housing Element Update could involve excavation and grading that could result in substantial soil erosion or the loss of topsoil. Additionally, these development projects could be located on a geologic unit or soil that is unstable or on expansive soils. Such risks are site-specific and are addressed through the City’s building permit process. The design and construction of new buildings are required to be engineered to address potential soil risks, pursuant to the SMBC and CBC. Additionally, as previously described, the City requires developers of new buildings to submit a Design-Level Geotechnical Report in accordance with the requirements of the City’s Guidelines for Geotechnical Reports. The Geotechnical Report is required to include a site-specific soils investigation to determine liquefaction potential on the site. All recommendations and design features in the Design-Level Geotechnical Report must be incorporated into the building design prior to building permit issuance to minimize risks associated with soil loss, unstable soils, and expansive soils. Therefore, impacts would be **less than significant**.

e) **No Impact.** The City is entirely supported by existing municipal wastewater infrastructure (see Section XIX, *Utilities*). Alternative wastewater disposal systems would not be necessary for new residential development projects, and therefore, there would be **no impact** related to soils supporting septic tanks or alternative wastewater disposal systems.

f) **Less Than Significant Impact.** Construction of new residential development planned under the proposed Housing Element Update could involve excavation and grading in areas with moderate to high sensitivity for buried historic period archaeological resources. However, in the event that paleontological resources or human remains are encountered with development of new housing projects, Public Resources Code Section 5097.98, as amended, would apply which includes procedures in the event of discovery. Therefore, with the applicability of Public Resources Code Section 5097.98, impacts would be **less than significant**.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a-b) **Potentially Significant Impact.** The proposed Housing Element Update would establish policies, revised standards, and actions to plan for new housing that could generate significant greenhouse gas (GHG) emissions and conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. Therefore, these issues will be analyzed further in an EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan area or, where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
g) Expose people or structures either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a-c) **Less Than Significant Impact.** The use, storage, transport, and/or disposal of hazardous materials is most often a function of the specific type of land use or project site. Residential uses do not generally involve the transport, use, disposal, or potential release of hazardous materials that could pose a significant hazard to the public or the environment. New residential development planned for by the proposed Housing Element Update would generally involve the use of household cleaners and solvents, which would not be used in large quantities that could generate a significant hazard. Therefore, impacts would be *less than significant*.

d) **Less Than Significant Impact.** Existing structures in the City built prior to 1978 may contain lead-based paint (LBP) or asbestos-containing materials (ACM). If not properly abated, the demolition of these structures could accidentally release hazardous materials and as such, could create a public health risk. In addition, some properties in the City have on-site underground storage tanks (USTs) and/or are underlain by contaminated soils or groundwater, which could be accidentally exposed during ground disturbing construction activities (e.g., excavation, grading, etc.). Demolition activities in the City are currently required to comply with South Coast Air Quality Management District (SCAQMD) Rule 1403, which regulates asbestos removal to control any asbestos fibers that could be potentially released during building demolition and renovation activities. LBPs are required to be abated and removed by a licensed lead contractor under California Code of Regulations, Title 8, Section 1532.1 et seq. The removal of USTs in the City as well as the removal and cleanup of soils contaminated by USTs are conducted under the oversight of the Santa Monica Fire Department (SMFD). In addition, current Federal, State, and local regulations require the evaluation of contaminated soils and groundwater at sites before development could take place. If contamination is identified and determined to exceed regulatory action levels, the responsible party would be required to undertake remediation procedures prior to ground disturbance under the supervision of the appropriate regulatory oversight agency. Sites with contaminated soils (not related to a UST) are required to be remediated under the oversight of the California Department of Toxic Substances Control under the authority granted by the Federal Resource Conservation and Recovery Act and the California Health and Safety Code. Sites with contaminated groundwater are required to be remediated under the oversight of the Regional Water Quality Control Board (RWQCB) under the authority granted by the California Water Code and the California Health and Safety Code.

New residential development planned for under the proposed Housing Element Update could occur on sites containing hazardous materials, such as LBP, ACM, and/or contaminated soils and groundwater. However, the proposed Housing Element Update would not make changes to existing regulations that address hazards associated with LBP, ACM, or contaminated soils and groundwater. Additionally, the proposed Housing Element Update does not propose standards or requirements that would conflict with existing regulations. New residential development projects would be required to conform to all applicable regulations that address hazardous materials including asbestos, lead, USTs, and contaminated soils and groundwater. Additionally, new residential development projects that are subject to discretionary review would continue to be reviewed under CEQA to evaluate potentially hazardous conditions at the sites. Therefore, impacts would be *less than significant*.

e) **Less Than Significant Impact.** SMO, located in the southeastern area of the City, covers approximately 215 acres of land generally bounded by Bundy Drive to the east, Santa Monica Business Park and Ocean Park Boulevard to the north, 23rd Street to the west, and Dewey Street in the City of Los Angeles to the south. SMO is a general aviation airport that primarily caters to personal aircraft and flight schools and contains a number of non-aviation uses primarily located in the area south of the runways, including the Santa Monica College Bundy Campus. This

airport is currently subject to a settlement agreement and Consent Decree with the Federal Aviation Administration (FAA) that require the City to maintain airport operations through December 31, 2028. SMO is also subject to Santa Monica Measure Local Control (LC), which governs use of the entire airport site should the City elect to close SMO at any time after December 31, 2028, as authorized by the Consent Decree.

The Los Angeles County Airport Land Use Commission (ALUC) is responsible for airport land use compatibility planning for Los Angeles County (County). Local actions, including rezoning and new housing projects located within an Airport Influence Areas (AIAs) must be submitted to the ALUC for review. None of the sites identified in the SSI are located in Santa Monica’s AIA. The proposed Housing Element Update would amend the Zoning Ordinance to permit new housing in the Office Campus zones (which includes the area adjacent to the northwest of SMO). However, new residential development projects planned for under the proposed Housing Element Update would not increase airport hazard risks at SMO. Further, all air traffic within the City is subject to stringent FAA and Caltrans regulations to protect the public from potential aircraft hazards or other safety concerns. Therefore, impacts would be *less than significant*.

f) **Less Than Significant Impact.** Emergency access requirements are established in the City’s Fire Code. New residential development planned for under the Housing Element Update would be required to conform to all applicable regulations that address emergency access, including the City’s Fire Code requirements. Future development proposals would be reviewed on a project-by-project basis by the SMFD to ensure that adequate emergency access is provided. Therefore, the proposed Housing Element Update would not result in inadequate emergency access. Impacts would be *less than significant*.

g) **No Impacts.** The City is highly urbanized and does not include any areas designated as a High or Very High Fire Hazard Severity Zone (FHSZ). The nearest wildfire zones are to the north of the City within the Santa Monica Mountains. New residential development planned for under the proposed Housing Element Update would not exacerbate wildfire risks. The proposed Housing Element Update would not involve installation of any infrastructure such as high-tension electricity lines that would exacerbate wildfire risk and would not increase public exposure to wildfires (i.e., placing residential uses in areas of high wildfire risk). The City is not located on a significant downslope of any potential high fire areas and would not result in increased structural or population hazards associated with post-fire slope instability or drainage alterations. **No impacts** associated with wildfires would occur.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
X.	HYDROLOGY AND WATER QUALITY. Would the project:				
a)	Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impeded sustainable management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
i) result in substantial erosion or siltation on- or off-site	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) **Less than Significant Impact.** The City of Santa Monica Urban Runoff Pollution Ordinance (SMMC Chapter 7.10) sets forth requirements to address water quality during the construction and operation of new land uses. Specifically, construction contractors in the City are required to implement Best Management Practices (BMPs) and pollutant control measures during construction activities to minimize pollutants and reduce runoff to levels that comply with applicable water quality standards. The following urban runoff reduction requirements are required to be implemented during construction:

Polluted runoff (including runoff containing sediments and/or construction wastes) shall not leave the construction parcel. No wash water from any type of cement and concrete machinery or concrete mix truck shall be allowed to leave the construction site. Any washing of equipment in the right-of-way shall be contained and properly disposed.

- Any sediment or other materials that are tracked off the parcel by vehicles and equipment shall be removed during the same day that they are tracked off the parcel. Where determined to be necessary, a temporary sediment control BMP (e.g., silt fences) shall be installed.
- For any paint removal, paint preparation, or sandblasting activities that will result in particles entering the air or landing on the ground, BMPs shall be implemented to prevent or minimize to the maximum extent practicable such particle releases into the environment.
- Plastic covering shall be utilized to prevent erosion of an otherwise unprotected area (e.g., exposed or open to elements) along with treatment control BMPs to intercept and safely convey the runoff to the Municipal Separate Storm Sewer System.
- No washing of construction or other vehicles shall be allowed adjacent to a construction parcel. No polluted runoff from washing vehicles on a construction parcel shall be allowed to leave the parcel.

- Erosion drainage controls (e.g., detention ponds, infiltration pits, dikes, filter berms, down drains, etc.) shall be utilized depending on the extent of proposed grading and topography of the parcel to prevent runoff.

Additionally, for the operational life of a new project, good housekeeping practices and BMPs are required to be implemented to minimize polluted runoff. These BMP requirements include the following:

- Urban runoff shall not be allowed to come into contact with the loading and unloading dock areas; vehicle repair and maintenance bays; vehicle and equipment wash areas; and fueling areas.
- Where there are outdoor areas for the storage of material that may contribute pollutants to the storm water conveyance system, these materials must be enclosed and protected by secondary containment structures. The outdoor storage area for materials must be paved and impervious and covered with a roof or awning to minimize collection of storm water within the secondary containment area.
- Drainage from adjoining roofs and pavement must be diverted away from the trash storage areas.
- Trash areas must be covered, screened, or walled to prevent off-site transport of trash, and must be connected to the sanitary sewer.
- Trash bins must have solid covers and be covered at all times except while being emptied.

Further, new projects are required to prepare an Urban Runoff Mitigation Plan to show that the new development would store and use (i.e., for non-potable purposes), infiltrate, or evapotranspire project-generated runoff during a 0.75-inch storm event, or alternatively, the applicant would pay the City an urban runoff reduction fee.

The proposed Housing Element Update would result in beneficial environmental effects on water quality and storm water runoff as new residential development projects would comply with the most recent and increasingly more sustainable site regulations that address water quality and storm water runoff. Specifically, new development projects would be subject to Chapter 9.26 (Landscaping) of the Zoning Ordinance which sets forth requirements for new landscaping that would protect water quality and reduce storm water runoff. For example, new residential development projects would be required to include planting of new vegetated areas, such as landscaped buffers and setbacks, to allow for increased storm water infiltration and reduced potential for erosion. Additionally, new parking lots would be required to provide adequate drainage and a minimum of 20 percent permeable surfaces to allow for storm water infiltration.

New residential development planned for under the proposed Housing Element Update would be required to conform to all applicable regulations that address water quality and storm water runoff, including the City's Urban Runoff Pollution Ordinance. Therefore, the proposed Housing Element Update would not violate any water quality standards and would not substantially degrade water quality. Additionally, the proposed Housing Element Update would not substantially alter the existing drainage patterns such that erosion or flooding would occur. Impacts would be *less than significant*.

b) **Less Than Significant Impact.** The proposed Housing Element Update would result in beneficial environmental effects on groundwater quality as new projects would comply with the most recent and more sustainable site regulations that address storm water runoff. Specifically, new residential development projects would be subject to Chapter 9.26 (Landscaping) of the Zoning Ordinance, which sets forth requirements for new landscaping that would create greater opportunities for groundwater recharge within the City. For example, new residential development projects would be required to include the planting of new vegetated areas, such as landscaped buffers and setbacks, allowing for increased storm water infiltration.

New residential development planned under the proposed Housing Element Update would be required to conform

to all applicable regulations that address groundwater, including those set forth by the RWQCB for groundwater dewatering. Therefore, the proposed Housing Element Update would not substantially deplete groundwater supplies or interfere with groundwater recharge. Impacts would be *less than significant*.

c) **Less than Significant Impact.** The overall drainage pattern of the City is to the southwest. An underground storm drain system intercepts surface runoff through a series of catch basins, connector pipes, and mainlines and carries the majority of the storm water to the Santa Monica Bay portion of the Pacific Ocean. The storm drain system is comprised principally of pipes and channels owned by two separate entities: the City of Santa Monica and the County of Los Angeles. Additionally, a few drainage facilities within the right-of-way of I-10 (Santa Monica Freeway) are under Caltrans jurisdiction.

The storm drainpipes and channels in the City range from 16 inches to 11 feet in diameter and extend for approximately 20 miles. The conduits are mainly constructed of reinforced concrete pipe or reinforced concrete. A few of the structures are brick arch drains, or corrugated metal pipes. Of the 2,308 catch basins collecting runoff into the storm drain system, 1,484 are owned and maintained by the County; the remaining 824 catch basins are owned and maintained by the City.

The City constructed the Santa Monica Urban Runoff Recycling Facility (SMURRF) to treat dry weather storm drain discharges from excess irrigation, spills, construction sites, pool draining, car washing and other activities that would otherwise drain into the Santa Monica Bay. Treated dry weather discharges are recycled for irrigation and dual plumbing purposes.

All residential development projects on sites over 15,000 square feet (sf) would be subject to the City's Runoff Conservation and Sustainable Management Ordinance requirements. This would include preparation and implementation of a Runoff Mitigation Plan to minimize polluted runoff in accordance with the City's Ordinance. In addition, the projects would be required to store and use (for non-potable purposes), infiltrate, or evapotranspire project-generated runoff during a 0.75-inch storm event, or alternatively, pay the City an urban runoff-reduction fee. New development projects would also be required to comply with landscaping requirements (Chapter 9.26) of the Zoning Ordinance, which includes landscaping requirements to protect water quality and reduce storm water runoff such as the planting of new vegetated areas, including landscaped buffers and setbacks, to allow for increased storm water infiltration and reduced potential for polluted runoff. Additionally, new parking lots would be required to provide adequate drainage and a minimum of 20 percent permeable surfaces to allow for storm water infiltration. Drainage infrastructure and drainage patterns associated with new residential development projects would also be reviewed by the City's Public Works Department as part of plan checks to ensure compliance with existing development guidelines and the implementation of general site regulations that address water quality and storm water runoff. Therefore, impacts would be *less than significant*.

d) **Less than Significant Impact.** The Federal Emergency Management Agency (FEMA) recently updated the City's Flood Rate Insurance Maps to account for flooding due to climate change and rising ocean levels. Based on the new maps, 85 beach front properties along SR-1 in the City are now within a FEMA defined Special Flood Hazard Area (SFHA), which is an area subject to a one percent or greater chance of flooding in any given year. To ensure compliance with FEMA, the City amended SMMC Chapter 7.68 (Floodplain Management Regulations) on March 3, 2021. The amended regulations require new construction in the SFHAs to obtain a floodplain development permit and implement safety requirements addressing flood risks.

Inundation by tsunami can also affect the low-lying beachfront properties of the City. In the event of a tsunami, the City has established designated tsunami evacuation routes to direct City residents and visitors away from the tsunami hazards quickly and efficiently. The City also adopted a Multi Hazard Functional Emergency Plan, which sets forth a plan of action to reduce risk and prevent loss from large scale emergencies, including tsunamis.

Although the proposed Housing Element Update would densify areas of the City by facilitating development of residences and commercial uses, the majority of new development would not occur within the FEMA SFHA or

within low-lying beachfront areas. In fact, none of the sites identified in the SSI associated with the proposed Housing Element Update are located within these areas. Therefore, the proposed Housing Element Update would not risk the release of pollutants due to project inundation in a flood hazard, tsunami, or seiche zone. Impacts would be *less than significant*.

e) **Less than Significant Impact.** The City water supply consists of local groundwater, imported water from Metropolitan Water District of Southern California (MWD), and urban treated runoff water from the SMURRF. The City’s primary sources of water supply include groundwater drawn from the Santa Monica Groundwater Basin and imported water supplies provided by MWD. The City prepared a 2020 Urban Water Management Plan (UWMP), which is slated for adoption in June 2021. The UWMP indicates that sufficient water supply exists to serve the projected number of residents under the Housing Element Update through the planning horizon of 2030. Therefore, proposed Housing Element Update would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be *less than significant*.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a-b) **Potentially Significant Impact.** The residential development planned for under the proposed Housing Element Update could physically divide an established community or cause a significant environmental effect due to a conflict with land use plan, policy, or regulation. Therefore, these issues will be analyzed further in an EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a-b) **No Impact.** No mineral extraction operations occur in the City. Additionally, the City does not contain existing mineral resource extraction areas designated by the State of California. Given that the City is highly urbanized and all of the sites identified within SSI associated with the proposed Housing Element Update have been previously disturbed by existing and/or previous development, the potential for mineral resources to be encountered is low. Therefore, new residential development planned for under the Housing Element Update would not result in the

loss of availability of a mineral resource or mineral resource recovery site and *no impacts* would occur.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan area or, where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a-c) **Potentially Significant Impact.** The construction and operation of new residential development planned for under the proposed Housing Element Update could generate temporary and permanent noise and vibration. Furthermore, new development could occur near SMO, exposing new residents and workers to excessive noise levels. Therefore, these issues will be analyzed further in an EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING. Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a-b) **Potentially Significant Impact.** The proposed Housing Element Update would plan for new residential development that would generate an increase in population within the City through the planning horizon of 2030. Further, new residential development could occur on sites with existing housing, displacing people or housing. Therefore, these issues will be analyzed further in an EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Parks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Other public facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a-e) **Potentially Significant Impact.** Residential development planned for under the proposed Housing Element Update would generate an increased residential population and subsequent demand for fire protection, police protection, schools, parks, and other facilities. Therefore, these issues will be analyzed further in an EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION.				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities, or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a-b) **Potentially Significant Impact.** The proposed Housing Element Update would plan for new residential development that would generate an increased residential population within the City, increasing the use of and demand for parks and other recreational facilities. Therefore, these issues will be analyzed further in an EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION. Would the project:				

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a-d) **Potentially Significant Impact.** New residential development planned for by the proposed Housing Element Update could generate increased vehicle miles traveled (VMT) and could result in hazardous design features and inadequate emergency access. As such, these issues will be further analyzed in an EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL RESOURCES: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a-b) **Potentially Significant Impact.** Assembly Bill (AB) 52 requires that after July 1, 2015 and prior to release of an EIR for a project, the lead agency shall consult with Native American Tribes to identify, evaluate, and mitigate impacts to tribal cultural resources if a Tribe has formally requested consultation. Further, Senate Bill (SB) 18 requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan. As such, to allow for compliance with AB 52 and SB 18, which mandate Native American consultation, if requested, this issue will be included in the EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or communications facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure or otherwise impair the attainment of solid waste reduction goals?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state and local statutes and regulations related to solid waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a-e) **Potentially Significant Impact.** Residential development planned for under the proposed Housing Element Update would generate an increased residential population and subsequently increase the demand for water, wastewater treatment and disposal, and solid waste disposal within the City. Therefore, these issues will be analyzed further in an EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides as a result of runoff post-fire slope instability or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a-d) **No Impact.** As described in Section IX, *Hazards and Hazardous Materials*, the City is highly urbanized and does not include any areas designated as a High or Very High FHSZ. The nearest wildfire zones are to the north of the City associated with the Santa Monica Mountains. New residential development under the proposed Housing Element would not exacerbate wildfire risks. The proposed Housing Element Update would not involve installation of any infrastructure such as high-tension electricity lines that would exacerbate wildfire risk and would not increase public exposure to wildfires (i.e., placing residential uses in areas of high wildfire risk). Further, the City is not located on a significant downslope of any potential high fire hazard areas and would not result in increased structural or population hazards associated with post-fire slope instability or drainage alterations. **No impacts** associated with wildfires would occur.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wild-life population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of rare or endangered plants or animals, or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? "Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a-c) **Potentially Significant Impact.** The proposed Housing Element Update would plan for an increase in residential development within the City over the 8-year planning horizon that would have the potential to affect the environment. These effects could be cumulatively considerable. Therefore, these issues will be analyzed further in an EIR.